



# COUNTY OF SUMMIT, OHIO

Russell M. Pry, Executive

R05-16-C-013

175 S. Main Street • Akron, Ohio 44308-1308 • 330.643.2510 • fax: 330.643.2507 • www.co.summit.oh.us

December 18, 2015

Mr. Matthew Didier  
U.S. Environmental Protection Agency Region 5  
77 West Jackson Boulevard  
Mail Code SE-7J  
Chicago, Illinois 60604-3507

**RE: Application for Brownfields Cleanup Grant  
EPA-OSWER-OBLR-15-06  
Former Edwin Shaw Hospital Property  
Village of Lakemore, Summit County, Ohio**

Dear Mr. Didier:

The County of Summit, Ohio (the "County") is pleased to submit this application for a FY2016 Brownfields Cleanup Grant for the Former Edwin Shaw Hospital Property located in the Village of Lakemore, Summit County, Ohio. The U.S. EPA Cleanup Grant will provide a permanent remedy to existing hazardous substance contamination on the site, rendering this property safe for redevelopment, to reduce unemployment, boost the local tax base, improve public health, and enhance environmental quality. This redevelopment project serves as an integral part of the County's development strategy. The required information is provided below:

- a) **Application Identification:** County of Summit, Ohio  
175 South Main Street, 8<sup>th</sup> Floor, Akron, Ohio 44308
- b) **Applicant DUNS number:** 02-083-2072
- c) **Funding Requested:**
  - i. Grant Type: Cleanup
  - ii. Federal Funds Requested: \$200,000
  - iii. Contamination: Hazardous Substances (\$200,000)
- d) **Location:** Village of Lakemore, Summit County, Ohio
- e) **Property Information:** Former Edwin Shaw Hospital Property  
2600 Sanitarium Road, Lakemore, Ohio 44250
- f) **Contacts:**
  - i. Project Director: Mr. Craig Stanley, Director  
Phone: (330) 926-2440  
Fax: (330) 926-2509

December 18, 2015

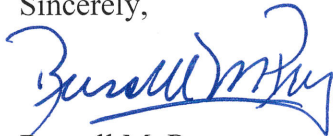
Email Address: [cstanley@summitoh.net](mailto:cstanley@summitoh.net)  
Mailing Address: County of Summit, Ohio  
Department of Administrative Services  
2525 State Road, Cuyahoga Falls, Ohio 44223

- ii. Chief Executive/Highest Ranking Elected Official  
Name: Mr. Russell M. Pry, Executive  
Phone: (330) 643-2605  
Email Address: [rpry@summitoh.net](mailto:rpry@summitoh.net)  
Mailing Address: County of Summit, Ohio  
175 S. Main Street, 8th Floor  
Akron, Ohio 44308

- g) **Date Submitted:** December 18, 2015  
h) **Project Period:** Three (3) years from the date grant is awarded  
i) **Population:** The population of the target community is 3,051.  
j) **Other Factors Checklist:** Included as an attachment to this letter.

Thank you in advance for your time and consideration of this application.

Sincerely,



Russell M. Pry  
Summit County Executive

### Appendix 3 Cleanup Other Factors Checklist

Name of Applicant: County of Summit, Ohio

Please identify (with an **X**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	<b>X Page 1</b>
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Targeted brownfield sites are impacted by mine-scarred land.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	<b>X Page 8</b>
Recent (2008 or later) significant economic disruption has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	<b>X Page 1</b>
Applicant is one of the 24 recipients, or a core partner/implementation strategy party, of a “manufacturing community” designation provided by the Economic Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, <b>applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation</b> which demonstrate either designation as one of the 24 recipients, or relevant pages from a recipient’s IMCP proposal which lists/describes the core partners and implementation strategy parties.	
Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project, and can demonstrate that funding from a PSC grant/technical assistance has or will benefit the project area. Examples of PSC grant or technical assistance include a HUD Regional Planning or Challenge grant, DOT Transportation Investment Generating Economic Recovery (TIGER), or EPA Smart Growth Implementation or Building Blocks Assistance, etc. To be considered, <b>applicant must attach documentation.</b>	<b>X Page 11</b>
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	

December 18, 2015

## **Ranking Criteria for Cleanup Grant:**

### **1. Community Need**

#### **1a. Targeted Community and Brownfields**

**1a-i. Targeted Community Description:** The Former Edwin Shaw Hospital Property that is the subject of this U.S. EPA Brownfields Cleanup Grant application encompasses 104 acres and is comprised of three (3) parcels of land solely owned by the County of Summit, Ohio. The Property is located in the Village of Lakemore, Summit County, Ohio. The Village of Lakemore is located in the southeastern portion of Summit County along the south side of Springfield Lake and two (2) miles southeast of the City of Akron, Ohio.

The Village began as a summer resort community in the 1900's during the growth of the rubber industry in Akron. Edwin Shaw Hospital began operating in 1908 as the Springfield Lake Sanitarium which was constructed as a regional five county tuberculosis hospital. In 1921 the Village of Lakemore was formed and incorporated. The target community is an older residential suburban community with sensitive populations including low-income populations and children, high-unemployment and high crime rates along one of the region's valuable water resources. The Village of Lakemore was placed in fiscal emergency by the State Auditor in 2010 as a result of decreases in revenue from the economic downturn, the loss of income tax revenue from the closing of the Edwin Shaw hospital in 2009 (which generated 50% of Lakemore's general fund tax revenue) and other community job losses which combined to result in a \$1.1 million general fund deficit. The Village is saddled with the 104-acre abandoned Former Edwin Shaw Hospital Brownfield property that attracts vandalism, vagrancy and illegal drug activities and has become a significant public health threat to this small community.

For over a century, Summit County has been a leader in innovation, attracting rubber, plastics, polymer and biomedical industries. The County has 541,781 residents, a total area of 413 square miles, and 31 local governments. The County's rich industrial past stems from the Ohio & Erie Canal and proximity to the industrial cities of Cleveland (12 miles north) and Youngtown (39 miles east). With abundant water resources, the County emerged as a transportation center, and rapid industrialization led to the establishment of the nation's largest rubber companies: B.F. Goodrich, Goodyear, Firestone, and General Tire. These companies became the largest employers in the County due to the mass production of cars. A subsequent decline in heavy manufacturing has created: widespread job losses, declining population, and urban decay due to the shrinking industrial sector. Rapid growth and deindustrialization have created brownfields throughout the County.

**1a-ii. Demographic Information:** The Target Community for this grant application is defined as the Village of Lakemore, County of Summit, Ohio.

	<b>Target Community</b>	<b>County</b>	<b>State</b>	<b>National</b>
<b>Population <sup>1</sup></b>	3,056	541,781	11,536,504	314,107,084
<b>Unemployment<sup>1</sup></b>	9.5%	9.5 %	9.2%	9.2%
<b>Poverty Rate<sup>1</sup></b>	10.6%	14.7 %	15.9%	15.6%
<b>Per Capita Income</b>	\$22,112	\$28,386	\$26,520	\$28,555



December 18, 2015

<b>Percent Elderly<sup>1</sup></b>	19.7%	15.3%	14.78%	13.7%
<b>Percent Minority<sup>1</sup></b>	7%	18%	16.8%	26.7%
<b>Median Household Income</b>	\$43,701	\$47,926	\$48,246	\$53,046

<sup>1</sup> American Community Survey, 2010-2014

**1a-iii. Brownfields:** The Property is the site of a former tuberculosis hospital which was later used for abandoned and abused children and chemical dependency treatment programs. The Sanitarium was renamed in 1997 and joined the Akron General Health System in 2005 as the Edwin Shaw Rehabilitation Institute until it was vacated in 2009. The facility consisted of the main hospital (319,000 square feet), Treatment Center Building (40,000 square feet), 13 residential cottages (4,500 square feet each), Power House (8,800 square feet), Laundry Building (6,900 square feet and operated an incinerator, and gasoline underground storage tank. Assessment of the Brownfield was conducted through a U.S. EPA Community Wide Assessment Coalition Grant for the Northeast Ohio Four County Regional Planning and Development Organization (NEFCO). Following completion of the Phase II Property Assessment a preliminary Remedial Action Plan (RAP) was prepared, also under the grant funds. Soil and groundwater investigation revealed soil impacted with lead and volatile organic compounds and building materials impacted with asbestos, polychlorinated biphenyls (PCBs), and mercury. Residential communities surround the property to the north, south and east and a golf course is present to the west.

The Property has been vacant since 2009 and the abandoned structures are attractive for illegal activities. High crime rates have been noted around Lakemore, an older suburb in fiscal emergency. The Former Edwin Shaw Hospital Property has been vandalized multiple times and vagrancy and illegal drug-activities is evident through the presence of discarded needles and blood trails. The Property, requires daily monitoring to prevent criminal activities which results in maintenance and policing costs for the Property which are as high as \$240,000 annually. This monitoring is done by Springfield Township Police and Lakemore Fire Department as well as County maintenance personnel. Returning the site to productive use will increase the tax base of the surrounding village, placed in fiscal emergency by the State Auditor in 2010 after job losses (much of which occurred when Akron General Medical Center vacated the Property) led to a \$1.1 million general fund deficit. This Brownfield has created an unproductive expanse of land that has removed developable space from the community and invited increased criminal activity.

High unemployment and poverty rates in this residential suburban community following business closures, and ripple effects are felt when sites are vacated. Brownfields are unsightly, creating negative impressions of communities. The Midwestern “Rust Belt” image of empty factories and polluted rivers plagues our region and is partly to blame for the loss of young adults ages 25-44 years, and the income and sales tax revenues that this group generates. Promising companies leave, and others are hard to attract when images of blighted and vacant cities come to mind. Brownfields are self-perpetuating. Citizens disinvest in their communities when they feel that others are doing the same and property values continue to decline as blight spreads.

December 18, 2015

**1a-iv. Cumulative Environmental Issues:** Lead and asbestos contamination are known and suspected contaminants in the target community where only 1-8% of the housing is considered “good or better” (Summit County Public Health). Sensitive populations in the target community include children and low-income populations which are highly susceptible to exposures of lead from paint in the older homes which make up the community and from the environment.

Contaminants from runoff enter the County’s many lakes and streams and endanger our use of lakes and streams for recreation, fishing and drinking water. Ingesting pollutants causes diseases that the poor cannot afford to treat. The County ranks among the dirtiest/worst 70% of U.S. counties for added cancer risk from hazardous air pollutants (Scorecard). Brownfield contaminants are linked to premature death, cancer, and other diseases. County cancer incidence rates exceed the U.S. rates for some cancers: 10% higher for lung cancer, 3% for colon-rectum cancer, 4% higher breast cancer mortality, and 15% higher mortality for all cancers (Ohio Family Health Survey, 2008).

While many factors cause respiratory diseases, poor air quality is linked to respiratory diseases and may be the cause of an alarming County rate of childhood asthma that is more than double the U.S. rate (Akron Beacon Journal, January 12, 2014). The County is in the 90-100<sup>th</sup> worst percentile of U.S. counties with recognized air releases of developmental toxicants (Scorecard). Poor air quality may also form acid rain, which enters the County’s extensive streams and lakes, sources of drinking water for the majority of County residents.

In addition to health threats, the Former Edwin Shaw Hospital Property is a public hazard subject to constant vandalism, vagrancy, and is a site of illegal drug activity. Springfield Township, an adjacent suburban community that polices Lakemore Village reported nearly 4,976 property crimes per 100,000 people in 2012, among the highest rates in the County. Springfield’s property crime rate, which includes Lakemore, nearly equals Akron’s, with a population 13 times the size of the township/village. The County had more than 900 seizures of methamphetamine lab/equipment in 2013, far outpacing the rest of Ohio (Akron Beacon Journal, January 6, 2014).

Illegal activities at this Brownfield have left behind a contaminated, damaged and unusable property that endangers the local communities and nearby populations. Redeveloping this Brownfield will reduce crime and restore a sense of security in the community.

### **1b. Impacts on Targeted Community:**

The public health of the target community is impacted by the presence of contaminants at the Property which include lead, volatile organic compounds asbestos, PCBs, and mercury.

Lead is particularly dangerous to the sensitive populations which make up the target community and the presence of deteriorating lead paint on the facility buildings of the Brownfield and in the surrounding soils are a concern for increased cancer risks. Asbestos, PCBs, and the volatile organic compounds detected are carcinogenic. Mercury is a powerful neurotoxin.

While these contaminants can have a significant health impact on the target community, the most immediate public health threat to the community posed by the Brownfield is the presence of the abandoned facility buildings and the criminal activities it attracts. The target community is a residential suburban community with sensitive populations including low-income populations and children, high-unemployment and high crime rates. The County had more than 900 seizures

December 18, 2015

of methamphetamine lab/equipment in 2013, far outpacing the rest of Ohio (Akron Beacon Journal, January 6, 2014). The Brownfield has been subject to constant vandalism, vagrancy, and illegal drug activity. Illegal activities at Brownfields leave behind contaminated and unusable properties that endanger communities and nearby populations. The Property, requires daily monitoring by local safety forces to prevent criminal activity at the premises which has significantly increased the annual maintenance costs to the County and reduces the presence of law enforcement in other areas of the target community.

The data summarized above suggests that sensitive populations in the Village of Lakemore, including low-income families and children, are disproportionately affected by health issues associated with the Brownfield.

Cleanup of the Brownfield on the Property will help to mitigate these threats to public health through removal of hazardous substance contaminated soil, reducing surrounding residents' exposure, eliminating a vacant property and the associated criminal activities, increase the job opportunities for the community, increase the tax base of the fiscally distressed Village of Lakemore, and restore a sense of security in the community.

### **1c. Financial Need:**

**1c-i. Economic Conditions:** The award of U.S. EPA cleanup grant funding will provide the critical financial resources needed to remediate the significant public health threat to the Village of Lakemore. The County-owned Former Edwin Shaw Hospital Property requires daily monitoring by local safety forces to prevent vandalism and annual maintenance costs as high as \$240,000.

Several events make this funding critical to Summit County's ability to eliminate this public health threat and return it to productive use:

This small suburban community was devastated by the recession and the closing of the hospital which reduced the tax base, reduced jobs and business opportunities, and depressed property values, plunging it into fiscal emergency. Local funds do not exist to pay for the full cost of redeveloping without assistance.

The economic downturn and population loss have left Summit County with over 1,000 vacant industrial parcels of land representing 2,435 acres. The cost of brownfield remediation adds significantly to the already high burden on County taxpayers.

The State of Ohio has cut more than 50 percent of its funding to local governments and eliminated other sources of tax revenue, leading to local government layoffs and service cutbacks. The State's brownfields funding program has been revised and is now largely a loan program with significantly lower levels of grants for assessments and cleanups.

**1c-ii. Economic Effects of Brownfields:** The Program will alleviate the public health threats and negative economic effect of the abandoned Former Edwin Shaw Hospital Brownfield on the County and the target community. The target community is a low-population, low-income area with high unemployment and high crime rates. The County-owned Former Edwin Shaw Hospital Property requires daily monitoring by local safety forces and County maintenance staff to prevent criminal activities and annual maintenance costs are as high as \$240,000. Budget cuts

December 18, 2015

have led to staff reductions which make this monitoring difficult to perform in the face of other, more pressing duties for this small community. This Brownfield has created a contaminated expanse of land that has removed developable space from the community and invited increased criminal activity. Redeveloping this brownfield will remove environmental impacts and reduce crime to restore a sense of security in the community.

Returning the site to productive use will increase the tax base of the Village, placed in fiscal emergency by the State Auditor in 2010 after the economic downturn, closing of the hospital, and job losses led to a \$1.1 million general fund deficit.

Brownfields create contaminated expanses of land that remove developable space from communities. Developers willing to invest in cities littered with brownfields have few options, and millions of dollars in lost real estate deals may result. High unemployment and poverty rates, follow business closures, and ripple effects are felt when industrial sites are vacated. Brownfields are costly when hazardous conditions on properties and the migration of contaminants from brownfield sites lead to legal action against individuals and communities. Brownfields are unsightly, creating negative impressions of communities. The Midwestern “Rust Belt” image of empty factories and polluted rivers plagues our region and is partly to blame for the loss of young adults ages 25-44 years, and the income and sales tax revenues that this group generates. Promising companies leave, and others are hard to attract when images of blighted and vacant communities come to mind. Brownfields are self-perpetuating as citizens disinvest in their communities when they feel that others are doing the same. Property values continue to decline as blight spreads.

The snowball effect of closed businesses and vacant properties has resulted in lost tax revenue, which makes it all the more difficult for the County and local community to find the assets or resources necessary to reverse the continuing decline. Additionally, the County’s declining tax base means less money is available to fund Brownfield redevelopment projects.

## **2. Project Description and Feasibility of Success**

The award of U.S. EPA cleanup grant funding will provide critical financial resources needed to remediate the significant public health threat to the Village of Lakemore posed by the environmental conditions and the criminal/drug related activities.

This project aligns with the County’s comprehensive approach to brownfields redevelopment to provide environmental benefits by fostering cleaner, healthier communities, economic benefits in creating/retaining jobs, enhancing local economies, and social benefits through promoting sustainable, vibrant, and more equitable communities. These goals are described in the following community and regional plans: *Summit County General Land Use and Development Plan 2006*, (Summit County), *2015 Comprehensive Economic Development Strategy* (NEFCO), *Summit County Public Health Strategic Goals 2013 and Fiscal Plan* (Summit County Public Health), *VibrantNEO 2040 Vision*, 2014 (Northeast Ohio Sustainable Communities Consortium), and *Connecting Communities, 2010* (Akron Metropolitan Area Transportation Study).

This project will further the work initiated for the assessment of this brownfield by the Northeast Ohio Four County Regional Planning and Development Organization (NEFCO) through a US EPA Community Wide Assessment Coalition Grant issued in 2012. Following completion of the

December 18, 2015

2013 Phase II Property Assessment a preliminary Remedial Action Plan was prepared detailing the approach and methodology for soil removal activities and quantities and presenting real costs for clean-up. The preliminary Remedial Action Plan was reviewed and commented upon by the Ohio EPA as part of technical assistance. The clear plan for cleanup allows for realistic project costs and an approach and methodology that permits the County to achieve project goals and expend funds in a timely and efficient manner such that the cleanup will be completed well within the three-year period of the grant.

## **2a. Project Description**

**2a-i. Existing Conditions:** The Former Edwin Shaw Hospital Property encompasses 104 acres and is comprised of three (3) parcels of land. The facility consists of the Main Hospital (319,000 square feet), Treatment Center Building (40,000 square feet), 13 residential cottages (4,500 square feet each), Power House (8,800 square feet), and Laundry Building (6,900 square feet) and had operated an incinerator and gasoline underground storage tank. The underground storage tank was removed in 1994 pursuant to State of Ohio regulations and is not subject to this grant. Three (3) drinking water wells are present on the Property in the vicinity of the Power House. The Property has been vacant since 2009. The County plans on conducting demolition of all existing buildings and cleanup activities to prepare the Property for much needed future commercial development.

Soil and groundwater investigation revealed soil impacted with lead surrounding the Power House, Laundry Building, Treatment Center Building and one of the water towers. Soil impacted with volatile organic compounds is present in the vicinity of the Power House. The investigations also found building materials impacted with asbestos, polychlorinated biphenyls (PCBs), and mercury. The cleanup costs for the asbestos abatement and mercury and PCB cleaning of the facility buildings prior to demolition are being funded by the County and being conducted prior to implementing soil cleanup activities.

The award of U.S. EPA cleanup grant funding will provide critical financial resources needed to remediate the significant public health threat to the Village of Lakemore posed by the environmental conditions and the criminal activities. This project aligns with the County's comprehensive approach to brownfields redevelopment to provide environmental benefits by fostering cleaner, healthier communities, economic benefits in creating/retaining jobs, enhancing local economies, and social benefits through promoting sustainable and equitable communities.

**2a-ii. Proposed Cleanup Plan:** The preferred alternative for the proposed cleanup plan includes excavation and removal of impacted soils to mitigate direct contact exposures and potential for leaching of contaminants in soils to drinking water. Remedial investigation will be conducted to better delineate the excavation limits and provide waste characterization of the areas exceeding the TCLP Calculated Maximum Concentration in a Solid. Leach-based soil standards will be developed using the U.S. EPA SESOIL model. Following delineation, soils will be excavated, transported, and disposed at an off-site licensed facility. For lead soils, soils will be treated in place and disposed as non-hazardous waste. To ensure protection of public health during cleanup of the Property, the County will conduct all cleanup activities in accordance with the Ohio EPA VAP Rules set forth in Ohio Administrative Code 3745-300 and under the oversight of the Ohio EPA. A Certified Professional licensed by Ohio EPA will oversee the cleanup and issuance of a

December 18, 2015

No Further Action Letter. A Covenant Not to Sue (CNS) determination from Ohio EPA may be sought if deemed appropriate. This preferred alternative contemplates the following: Excavation, treatment, and disposal of up to 900 tons of lead impacted soil that may be characterized as TCLP hazardous prior to treatment; excavation and disposal of up to 900 tons of VOC impacted soils as non-hazardous solid waste; and placement of approximately 1,800 tons of clean soil backfill.

Additional details regarding the cleanup plan are discussed in the attached Analysis of Brownfield Cleanup Alternatives (ABCA) included as **Attachment F**. Before commencement of remediation activities, a Health and Safety Plan, Sampling and Analyses Plan, and Quality Assurance Project Plan will be completed. During site work, the County's project manager will be responsible for ensuring that the health and safety guidelines, as well as applicable federal/state/local environmental laws are enforced.

## **2b. Task Description and Budget Table**

### **2b-i. Task Description:**

**Task 1 – Remedial Investigation & Characterization –Environmental Consultant** – This activity will be contracted to a qualified environmental consultant selected by the County to conduct delineation and waste characterization activities in compliance with procurement provisions contained in 40 CFR 31.36. This cost estimate is based remedial Alternative #3 of the ABCA. Activities include delineation of excavation areas and waste characterization of the soils to be excavated. The anticipated outputs for this project will include a Delineation and Characterization report documenting sampling activities, results, and final estimated quantities to be removed and recommendations for proper disposition.

**Task 2 – Excavation of Impacted Soils – Environmental Contractor** – This activity will be contracted to a qualified environmental contractor selected by the County to conduct excavation activities in compliance with procurement provisions in 40 CFR 31.36. Site cleanup activities include, but are not limited to: excavation of lead impacted soil that may be characterized as hazardous waste (D008), treated on-site, and disposed as non-hazardous (900 tons at \$175 per ton = \$157,500); removal, transport, and disposal of VOC and SVOC impacted soils as non-hazardous solid waste (900 tons at \$55 per ton = \$49,500); and backfilling excavations with clean soil (1,800 tons at \$25 per ton = \$45,000). The environmental contractor costs for cleanup activities that exceed the U.S. EPA Cleanup Grant amount will be paid by the County out of voluntary cost share funds. The anticipated outputs for this project will include a report summarizing the amount of soil disposed as hazardous, amount of soil removed and disposed as solid waste, and the amount soil backfill placed in the excavated areas.

**Task 3 – VAP NFA Activities – Environmental Consultant** – This activity will be contracted to a qualified environmental consultant selected by the County to oversee site excavation cleanup activities and will comply with procurement provisions in 40 CFR 31.36. VAP NFA activities include but are not limited to development of leach-based soil standards (~\$15,000), remediation oversight (~\$20,000), property boundary topographic survey (~\$17,500), VAP Phase II Property Assessment Report with Property Specific Risk Assessment (~\$45,000), and preparation of the NFA letter (~\$12,000). The environmental consultant's costs for VAP NFA activities will be

December 18, 2015

paid by the County out of voluntary cost share funds. The anticipated outputs for this project will include a VAP Phase II Property Assessment Amendment report and NFA Letter.

**2b-ii. Budget Table:** The project budget focuses all the cleanup grant funds on actual site cleanup and regulatory approval and includes a significant amount of voluntary cost share.

<b>Budget Categories</b>	<b>Project Tasks (\$)</b>			
(programmatic costs only)	<b>Task 1 RI &amp; Characterization</b>	<b>Task 2 Site Cleanup</b>	<b>Task 3 Reporting and NFA Activities</b>	Total
Personnel	\$0	\$0	\$0	\$0
Fringe Benefits	\$0	\$0	\$0	\$0
Travel	\$0	\$0	\$0	\$0
Equipment	\$0	\$0	\$0	\$0
Supplies	\$0	\$0	\$0	\$0
Contractual	\$20,000	\$180,000	\$0	\$200,000
Total Federal Funding	\$20,000	\$180,000	\$0	\$200,000
Cost Share	\$0	\$40,000	\$0	\$40,000
Voluntary Cost Share	\$10,000	\$32,000	\$120,000	\$162,000
Total Budget	\$30,000	\$252,000	\$120,000	\$402,000

**2c. Ability to Leverage:** The County is primarily funded by tax revenues (property and sales/use tax) and operating grants from sources such as the Department of Housing and Urban Development, the Department of Agriculture, the Department of Justice, Homeland Security, and the Ohio Department of Job and Family Services. In response to the decreases in revenues during the recent recession the County significantly reduced expenses and the size of its workforce, while using different collaborations to continue to offer services to the public at the same level.

The County has a strong track record of successfully leveraging funds to meet the financial needs of its revitalization projects. Most recently, the County has engaged in project with Akron Phoenix Development, LLC to redevelop and repurpose an industrial facility previously used by Bridgestone Firestone in their tire manufacturing operations. The building is being converted to office space into which the County will relocate a number of its functional departments. Included in this project are the County, the developer, the Ohio Department of Job and Family Services.

Another example of leveraging funds is the completion of the Bridgestone Technical Center. The County again collaborated with the Development Finance Authority, the State of Ohio

December 18, 2015

Department of Development and the City of Akron to construct a new state-of-the-art \$70 million, 260,000 square foot Technical Center in the City, which opened in 2012. The project resulted in Bridgestone's agreement to maintain the center and all related jobs in the City for 20 years.

The County, the City of Akron, the Ohio Department of Development, the Development Finance Authority, Goodyear Tire & Rubber and a private developer all worked in collaboration to accomplish the construction of a new headquarters for Goodyear, redevelopment of the former Goodyear Headquarters facilities, and construction of parking facilities to accommodate the redeveloped uses. Project financing included tax incentives, TIF loans, bond financing, structured leases and state grants. The project incented Goodyear to maintain its headquarters in Akron thus preserving thousands of jobs, as well as furthering the redevelopment of the prior headquarters buildings and other portions of the surrounding area, including the development of a new hotel.

Source of funding for the Edwin Shaw Hospital project include allocated funds from the County General Fund and funding through the Summit County Revitalization Corporation which has committed to contribute \$150,000 per year for 5 years to the cost of the project. Additionally, NEFCO has been an involved partner in this project providing funding for the assessment, remedial action plan and ABCA. The Development Finance Authority, through the use of New Market Tax Credits or other funding vehicles available to it, will likely be a partner in the ultimate redevelopment of the property. The Ohio Development Services Agency (formerly known as the Ohio Department of Development) is also a likely partner in the redevelopment. The County will also provide financial participation.

The County will provide the required 20% cost share (totaling \$40,000) in the form of money to fund the proposed cleanup at the Property. In addition, the County will provide voluntary cost share monies in the sum of \$162,000, since the overall project budget for the proposed cleanup activities significantly exceeds the amount that would be provided by the Cleanup Grant. Documentation of this is included in **Attachment D**.

### **3. Community Engagement and Partnerships**

#### **3a. Plan for Involving Targeted Community & Other Stakeholders; and Communicating**

**Project Progress:** Summit County draws on the strengths of its community partnerships to address challenges comprehensively by providing environmental benefits, economic benefits, and social benefits for the communities of the County.

The County works closely with the Northeast Ohio Four County Regional Planning and Development Organization (NEFCO) which administers the Summit Brownfields Revitalization Program. Assessment of this Brownfield and the Remedial Action Plan were conducted through a U.S. EPA Community Wide Assessment Coalition Grant issued to NEFCO as part of the Summit Brownfields Revitalization Program.

The County is committed to educating its taxpayers about its work. The County has implemented a communication strategy to ensure local residents, businesses and community leaders know as much as possible about this Brownfield project before, during and after cleanup.



December 18, 2015

In addition, the County engages local stakeholders during the design and redevelopment of projects, as detailed in the *Summit County General Land Use and Development Plan 2006*.

At community meetings, attendees have the opportunity to question the County staff directly involved with the design and implementation of projects including the design engineers and project managers. Attendees can provide verbal and/or written feedback on all aspects of projects. Following each meeting, all questions/comments are compiled into a formal report, which is shared with local elected officials. Input received from community partners was critical to the identification, assessment, and preparation of the Remedial Action Plan for this Brownfield.

The County not only wants to transform Brownfield sites like the Property into productive uses that will benefit the target community, but also address issues pertaining to health, safety and community disruption throughout the area. The County will work with the community partners discussed in *Section 3c* to identify and engage with sensitive populations and surrounding residents in order to inform them of the cleanup process. The County is committed to continuing to communicate with local stakeholders throughout the project. The County will rely on guidance provided by U.S. EPA and Ohio EPA staff to achieve site cleanup that is protective of workers, residents, the public, and the environment.

Community notification was placed in the Akron Beacon Journal on November 30, 2015 to inform the target community that a copy of this grant proposal, including the draft ABCA, is available for public review and comment in the Summit County Administrative Offices and on the Summit County website. The community notification notes that the County will accept comments on the draft proposal and announced the date and time of the public meeting. The County held a public meeting to discuss the draft proposal and consider public comment, on December 7, 2015 in the Summit County Council Chambers, 175 South Main Street, Akron, Ohio.

Should this grant be awarded and once the ABCA is finalized the County will make it available for review and comment on the Summit County website and will hold a public meeting.

The County plans to partner with NEFCO and the Land Bank to assist with these meetings and to report on project status. County staff will facilitate each meeting and ensure the community has direct contact with the County to address any comments. As part of these public engagement activities, the County will address any resident concerns that arise by collecting public comments and posting responses to these concerns online for review.

Upon completion of cleanup activities, the County will work with NEFCO and other stakeholders, to plan and host a final site tour for stakeholders and media. This will provide the County and community with a platform to encourage future Brownfield remediation.

**3b. Partnerships with Government Agencies:** The County will work closely with the Ohio EPA Division of Environmental Response and Revitalization, Voluntary Action Program (VAP) to ensure that cleanup activities meet the VAP requirements for a No Further Action, and if warranted, a Covenant Not To Sue (CNS) to be issued by the Director of the Ohio EPA. The Ohio EPA provided technical assistance with the Phase II Property Assessment and preliminary

December 18, 2015

Remedial Action Plan and supports the County in its grant for this cleanup grant application (**Attachment B**).

**3c. Partnerships with Community Organizations:** The County has developed strong partnerships with a multitude of community organizations in the community service area. Partnerships have been vital to the successful implementation of past projects and identifying the best partners for this cleanup project is crucial to its success. The following community organizations will be part of the redevelopment process and documentation of their commitment is included in **Attachment C**.

*The Summit County Land Bank*

The Summit County Land Bank supports neighborhood and community reinvestment and economic development efforts through the strategic acquisition, reclamation, rehabilitation and reutilization of property in Summit County in order to revitalize neighborhoods, stabilize property values, and return property to productive use. The Summit County Land Bank has leveraged funds for assisting in the demolition of the Former Edwin Shaw Hospital which includes up to \$750,000 in demolition costs. In addition, the Summit County Land Bank will assist the County with conducting outreach to engage local residents and community leaders, including information regarding the cleanup project in the Land Bank's printed documents and bulletins.

*Northeast Ohio Four County Regional Planning and Development Organization (NEFCO)*

NEFCO was formed in 1974 as a regional council of governments within Portage, Stark, Summit and Wayne Counties. It was created to enable local officials to discuss problems and develop strategies and serves as a forum through which planning programs can be coordinated. NEFCO operates the Summit Brownfields Revitalization Program which provides funds for Phase I and II environmental site assessments within the County. NEFCO has leveraged the funds for the assessment work and remedial action plan completed for the Property and for the attached ABCA and has committed to continue providing assistance through planning and coordination.

*Northeast Ohio Sustainable Communities Consortium (NEOSCC)*

The NEOSCC leads regional planning efforts and enables the public, agencies, and Northeast Ohio communities to inform, prioritize, align, and coordinate actions to advance sustainability in their areas of impact. NEOSCC supports the County's application and documents that the County is a member of the NEOSCC which, through the Northeast Ohio Areawide Coordinating Agency acting as fiscal agent, was the recipient of a FY2010 \$4.25 million Sustainable Communities Regional Planning Grant from HUD as part of the HUS-DOT-EPA Partnership for Sustainable Communities.

*The Development Finance Authority of Summit County*

The Development Finance Authority of Summit County implements economic development financing initiatives that strengthen and diversify the economy of Summit County and Northeast Ohio by encouraging investments in business, industrial, transportation, distribution and community development projects. Since 1999, the DFA has issued over \$835 million in economic development bonds, leveraging \$775 million in investment to support community and

December 18, 2015

economic development activity in the region. This partner has committed to providing new market tax credits for redevelopment of the Property. These are a targeted and cost-efficient financing tool valued by potential investors for which the Village of Lakemore qualifies.

*Summit County Public Health District*

The Summit County Public Health District protects and advanced the health of the entire community through its policies, programs and activities that protect the safety, health and well-being of the people in Summit County. Through its policies, programs and activities, the Health District endeavors to create a healthful environment and ensure the accessibility of health services to all. This partner has committed to assist the County with outreach to the local residents and community leaders, provide expert advice as requested and provide assistance with risk communication, including information regarding the cleanup project in organization's printed documents and bulletins.

**4. Project Benefits**

**4a. Health and/or Welfare and Environment:**

**4a-i. Health and/or Welfare Benefits:** The target community is an older residential suburban community with sensitive populations including low-income populations, elderly and children, high-unemployment and high crime rates. The fiscally distressed community is saddled with the 104-acre abandoned Former Edwin Shaw Hospital Brownfield that has attracted significant vandalism, vagrancy and illegal drug activities and has become an immediate public health threat to this small community. This Brownfield has created a contaminated facility and expanse of land that has removed developable space from the community and invited increased criminal activity. Redeveloping this Brownfield will remove environmental impacts and reduce crime to restore a sense of security in the community.

Remediation of the Property to meet a property specific risk-based residential use standard will eliminate potential pathways by which contaminants could reach the surrounding residents and future workers. The cleanup of hazardous substances in soil will minimize the potential for impacts to nearby sensitive populations and people that access the Property.

Cleanup and removal of the 17 abandoned facility buildings will remove the locations where vandalism, vagrancy and illegal drug activities which have been perpetrated, thus endangering the community and nearby populations. This will also eliminate the maintenance and policing costs for the Property which is up to \$240,000 annually.

Cleanup of the Brownfield on the Property will help to mitigate these threats to public health through removal of hazardous substance contaminated soil, reducing surrounding residents' exposure, eliminating a vacant property and the associated criminal activities, increase the job opportunities for the community, increase the tax base of the fiscally distressed Village of Lakemore, and restore a sense of security in the community.

**4a-ii. Environmental Benefits:** Removal of soil and building materials with impacts from lead, asbestos, mercury, PCB, and other contamination reduces exposure to nearby residents, ongoing exposures in the buildings, uncontrolled releases, and leaching of impacted soils into groundwater. The target community and its sensitive populations experiences cumulative issues

December 18, 2015

from these compounds from lead based paints and asbestos in homes, contaminants entering run-off and entering nearby by water resources (such as Springfield Lake) and groundwater which is used as a drinking water source in the Village. In a County which ranks among the dirtiest of U.S. counties for added cancer risk and childhood asthma and cancer incidences higher than U.S. rates, addressing local Brownfields is an important step to improving the quality of life for the target community and the County ([www.scorecard.org](http://www.scorecard.org)). Additionally, groundwater in this area is a drinking water source. It is important to remove impacted soils from which contaminants can leach into the water supply. Cleanup and redeveloping this Brownfield will remove environmental impacts and reduce crime to restore a sense of security in the community.

#### **4b. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse**

**4b-i. Planning, Policies, Ordinance or Other Tools:** The County is committed to implementing and promoting sustainable development practices that advance environmentally safe/sustainable use, implementing measures that protect freshwater resources and community health, investing in existing land and infrastructure.

The project specifications will recommend sustainable practices including the identification of uses of materials otherwise considered waste and encourage operational practices, such as engine idle reduction practices, to minimize air emissions. During the bid evaluation, consideration will be given to the green remediation best management practices the contractor includes in their bid package. The demolition planned for the Property will rely on a sorting process that will minimize landfill disposal by recovering recyclables such as metals, concrete/brick/masonry material that can be crushed and reused on-site. The post remediation redevelopment provides for the reuse/optimization of existing infrastructure, which will allow existing resources, both man-made and natural, to be put to better use.

The most immediate sustainable development for the Property will be the impact on community health through the removal of the abandoned facility buildings and public hazards created by criminal/drug related activities attracted to this Property.

**4b-ii. Integrating Equitable Development or Livability Principles:** Sustainable and equitable development principles include the reduction in toxicity from the elimination of an abandoned Brownfield in a low-income neighborhood and the eradication of a large blighting influence on a small community. Removing the public health hazard posed by significant criminal activity at the Brownfield and returning the site to productive use by providing employment for residents and increasing the tax base of the Village provides equitable development through creating healthy, vibrant, communities of opportunity. This integrates the livability principles through needed community revitalization.

#### **4c. Economic and Community Benefits**

**4c-i. Economic or Other Benefits:** The most direct and immediate economic impact of the proposed cleanup at the Property is the reduction of the added costs to the target community associated with policing the criminal/drug related activities at the Brownfield and the elimination of annual maintenance costs to the County.

More difficult to track, but most certain to occur, is the return of this Property to productive commercial use. The potential for development of the 104-acre Brownfield, the reduction in

December 18, 2015

crime and illicit activity, and increased opportunity for lower income families of the community for employment and potential for new commercial developments that are attracted to the area by this cleanup project are important direct economic benefits for the target community and the County.

**4c-ii. Job Creation Potential: Partnerships with Workforce Development Programs:** The County of Summit favors awarding contracts to local vendors. The purchasing ordinances include a preference in the scoring for contractors located within Summit County (see section 177.03 of the Codified Ordinances of Summit County). Further, the County's purchasing ordinances include a provision indicating that a contractor bidding on a County project must certify that it will make its best efforts to utilize employees primarily from Summit County or contiguous counties, and that they will pay prevailing wages (see section 177.14 of the Codified Ordinances). This section further requires that any contractor being awarded a County contract must notify the taxing authority of the local political subdivision prior to beginning work, whether using sub-contractors or independent contractors, and who those persons will be. Compliance with this section will be monitored by the County's prevailing wage coordinator. Upon awarding of a contract, the above mentioned requirements will be incorporated into the contract document.

## **5. Programmatic Capability and Past Performance**

### **5a. Programmatic Capability:**

If awarded, Mr. Craig Stanley, Director of Administrative Services for the County, will be the project manager for this grant. He will oversee day-to-day activities and manage all contractors and sub-contractors associated with the cleanup and demolition. Mr. Stanley has been with the County for 17 years and has been the Director of Administrative Services since 2005. He is responsible for administration and oversight of all Capital Improvement Plan projects within the County and has experience in managing Energy Efficiency and Conservation Block Grants from the US Department of Energy. In that time he has overseen a number of complex projects including the demolition and clean-up of a former industrial property owned by Brown and Graves, the demolition of the former County morgue, and a number of energy efficiency projects completed with block grant funding, all of which were completed on time and within budget. All projects the County conducts, in compliance with the County's purchasing policies, must be done using a sealed bid process. The County has extensive experience with writing bid specifications, preparing requests for proposals, selecting highly qualified professionals to implement necessary services, conducting the review and awarding of the project and negotiating all necessary contracts. In addition, the County administrative staff will facilitate the review and approval of tasks and invoices in support of the grant. The County has multiple contracts with highly qualified environmental and engineering consulting firms to support management of the grant and the cleanup effort.

Additionally, if the grant is awarded, the work will be completed in compliance with 42 USC 3141 – the Davis Bacon act. John Kinsey, the County's prevailing wage coordinator will be responsible for monitoring compliance with that act. Mr. Kinsey has years of experience monitoring compliance with state and federal level wage laws and rules.

December 18, 2015

In order to effectively track the progress of proposed cleanup activities, the County plans to measure outputs and report these to the community with the assistance of NEFCO, the Summit County Land Bank, and the Summit County Public Health District.

**5b. Audit Findings:**

To date, the County has received no adverse audit findings.

**5c. Past Performance and Accomplishments**

**5c-i. Currently or Has Ever Received an EPA Brownfields Grant:** The County has never received an EPA Brownfield Grant.

**5c-ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements:**

The County operates with numerous federal and non-federal funding grants and has a successful track record with the management and implementation of grant funds. A description of three recent federal and non-federal funded grants managed by the County is presented below.

U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (2015) - \$933,000. The County receives a formula allocation from HUD to provide services for low to moderate income individuals and/or in low to moderate income areas. Services provided include but are not limited to: Minor home repairs, sewer tie-it, sanitary sewer connections, waterline replacement, public services and economic development. The County meets the timeliness deadline of November 1st each year for HUD. All projects are finished within the allotted time set forth by HUD.

HUD HOME Investment Partnership Grant - \$323,000. The County receives a formula allocation from HUD in a funding period of January 1<sup>st</sup> to December 31<sup>st</sup> to provide affordable housing for low to moderate income individuals. The County meets all commitment and expenditure deadlines set forth by HUD.

Ohio EPA Septic Replacement Grant - \$218,000. The County works with the Health District to identify and replace failing septic systems for low to moderate income households in a funding period of January 1<sup>st</sup> to December 31<sup>st</sup> annually. Over 30 septic systems have been replaced with this grant since 2011. All deadlines and expenditures set forth by the Ohio EPA have been met.

The County monitors the outputs and outcomes of each grant by reporting progress regularly in accordance with grant requirements. The requirements for the above listed grants have been met and all reports and other submissions to date have been submitted within the required timeframes and approved.

**5c-iii. Has Never Received Any Type of Federal or Non-Federal Assistance Agreements:**

Not Applicable.

# **ATTACHMENT A**

## **THRESHOLD DOCUMENTATION**

December 18, 2015

## Threshold Criteria

### 1. Applicant Eligibility:

- a. Eligible Entity: County of Summit, Ohio (the “County”) is considered a Government Entity Created by a State Legislature and its Charter.
- b. Site Ownership: The Former Edwin Shaw Hospital Property is comprised of three (3) parcels designated Permanent Parcel Numbers (PPN) 5401864A, 5401864B, and 5106284. All three (3) parcels are solely owned by the County of Summit, Ohio. Copies of the recorded deeds are included in **Appendix A**.

### 2. Letter from the State or Tribal Environmental Authority: A letter from the Ohio Environmental Protection Agency (EPA) acknowledging that the applicant plans to conduct cleanup activities and is applying for federal grant funds is provided as **Attachment B**.

### 3. Site Eligibility and Property Ownership Eligibility:

- a. Basic Site Information
  - (a). *Name of Site*: Former Edwin Shaw Hospital Property
  - (b). *Address of Site*: 2600 Sanitarium Road, Lakemore, Ohio 44250
  - (c). *Current Owner of Site*: County of Summit, Ohio
- b. Status and History of Contamination at the Site
  - (a). *Type of Contamination*: Hazardous Substances
  - (b). *Operational History and Current Use(s) of Site*: The Property is the site of a former tuberculosis hospital which was later used for abandoned and abused children and chemical dependency treatment programs. The Sanitarium was renamed in 1997 and joined the Akron General Health System in 2005 as Edwin Shaw Rehab until it was vacated in 2009. The facility consists of the main hospital (319,000 square feet), treatment center building (40,000 square feet), 13 residential cottages (4,500 square feet each), Power House and Boiler House (8,800 square feet), and Laundry Building (6,900 square feet), and operated an incinerator and gasoline underground storage tank. The UST was removed in 1994 and was issued a No Further Action Status by the State of Ohio, Bureau of Underground Storage Tank Regulations as no associated contamination was present.
  - (c). *Environmental Concerns*: Lead, asbestos, polychlorinated biphenyls (PCBs), mercury, and volatile organic compounds.
  - (d). *How Site Became Contaminated*: The Property became contaminated from the decades of operations of the powerhouse, incinerator, boiler, laundry, and past use of lead based paint on exterior surfaces of the buildings.



December 18, 2015

- (d). *Nature and Extent of Contamination:* Soil and groundwater investigations conducted by Partners Environmental Consulting, Inc. (Partners) in 2013 through a USEPA Community Wide Assessment Coalition Grant for the Northeast Ohio Four County Regional Planning and Development Organization (NEFCO) revealed soil impacted with lead surrounding the Power House, Laundry Building, Treatment Center Building and one of the water towers. Soil impacted with volatile organic compounds is present in the vicinity of the Power House. The investigations also found building materials impacted with asbestos, polychlorinated biphenyls (PCBs), and mercury.
- c. Sites Ineligible for Funding:
  - (a). This site is not listed or proposed for listing on the National Priorities List.
  - (b). This site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA.
  - (c). This site is not subject to the jurisdiction, custody, or control of the United States government.
- d. Sites Requiring a Property-Specific Determination: The site does not fall into any of the categories that require a property-specific determination from EPA to be eligible for funding.
- e. Environmental Assessment Required for Cleanup Proposals: A Phase II Property Assessment (dated October 24, 2013) completed in accordance with the Ohio EPA Voluntary Action Program and a Preliminary Remedial Action Plan (dated October 24, 2013) for the Property were prepared by Partners. These reports were reviewed and commented upon by the Ohio EPA as part of technical assistance provided by the Agency. In addition, Asbestos Survey Reports (dated September 24, 2013 and September 27, 2013) and a Mercury Visual Inspection and Air Sampling Report (dated October 23, 2013) were prepared by Partners.

CERCLA §107 Liability: The County has owned the impacted parcels of the Property since 1921 as the Board of Summit County Commissioners and later as County of Summit, Ohio. The County obtained the land as concerns for public health and tuberculosis at that time required that eligible Counties provide a tuberculosis hospital to serve area communities. The third parcel of land which makes of the Property has been owned by the County since 1992 and has historically been wooded land. The County has owned the Property since prior to the issuance of the CERCLA liability laws. The Sanitarium and later Edwin Shaw Hospital were operated by a third-party (§ 107(b)(3) and § 101(35)(A)(ii)). The County is conducting cleanup of the property in compliance with a state cleanup program (CERCLA § 128(b)). The Property was deemed eligible for and received U.S. EPA assessment grant funding.

December 18, 2015

The County commits to comply with all Continuing Obligations after acquiring the site. The County will take appropriate care regarding any hazardous substances found at the site, including preventing future releases and exposures to hazardous substances on the site; will provide all legally required notices and cooperate with authorized response person in the event of discovery or release of any hazardous substances at the site; and comply with any land-use restrictions associated with response actions at the site.

f. Enforcement or Other Actions: The Property is not subject to enforcement or other actions.

g. Information on Liability and Defenses/Protections:

i) *Information on the Property Acquisition:* The County owns all three (3) parcels of land that make up the Former Edwin Shaw Hospital Property. Copies of the deeds are included in **Appendix A**. The County has owned the two (2) parcels which make up the hospital facility since 1921 as the Board of County Commissioners and later (2004) as County of Summit, Ohio. The County was deeded the land because the State of Ohio required that eligible Counties provide a tuberculosis hospital to serve area communities.

The dates of acquisition, nature of ownership, and name of the party from whom ownership was acquired for each parcel is presented in the table below. The County has no familial, contractual, corporate, or financial relationships or affiliations with prior owners or operators of the Property.

Parcel Number	Date of acquisition	Nature of ownership	Previous Owner
5401864(A)	6/2/1921	Deed	Joint Board of County Commissioners of Columbiana, Portage, Stark, Summit and Mahoning
5401864(B)	6/2/1921	Deed	
5106284	12/18/1992	Deed	Robert E. Savage

ii) *Timing and/or Contribution Toward Hazardous Substances Disposal:* The County has owned the Property since 1921 as the Board of County Commissioners and later as County of Summit, Ohio. The County obtained the land as concerns for public health and tuberculosis at that time required that eligible Counties provide a tuberculosis hospital to serve area communities. The County has owned the Property prior to the issuance of the CERCLA liability laws. The Sanitarium and later Edwin Shaw Hospital were operated by a third-party (§ 107(b)(3) and § 101(35)(A)(ii)).

The contaminants present include: Lead in soil from paint historically used on the facility buildings and water tower. Volatile organic compounds present in

December 18, 2015

soil in the vicinity of the Power House. ACMs in building materials placed between initial construction in 1915 through construction of the last addition in 1984. Historic use of PCB containing oils in the hydraulic elevator equipment, and use of mercury containing devices in the Power House and Main Hospital. The County did not cause or contribute to any release of hazardous substances at the site, arrange for disposal of hazardous substances at the site, or transport hazardous substances to the site.

- iii) *Pre-Purchase Inquiry:* The County acquired the property in 1921 prior to CERCLA. No Phase I ESA was conducted at the time of the acquisition. A Phase I ESA in compliance with AAI, ASTM E1527-13, and the Ohio VAP was completed at the site by Tetra Tech on behalf of the Ohio EPA Division of Emergency & Remedial Response, Site Assessment and Brownfield Revitalization Program in 2010. The Environmental Professional as defined by 40 CFR 312.10 who completed the Phase I ESA is listed as Vicky Farmer, Environmental Scientist.
- iv) *Post-Acquisition Uses:* The County has owned the Property since 1921 as the Board of County Commissioners and later as County of Summit, Ohio. The County obtained the land as concerns for public health and tuberculosis at that time required that eligible Counties provide a tuberculosis hospital to serve area communities. The County has owned the Property since prior to the issuance of the CERCLA liability laws. The Sanitarium and later Edwin Shaw Hospital were operated by a third-party. The Property is now vacant and there will be no future uses of the Property under County ownership.
- v) *Continuing Obligations:* The County has taken appropriate care with respect to hazardous and petroleum products at the site by limiting access to the property and completing assessment activities in accordance with the state cleanup program.

The County hereby confirms it will comply with all future land-use restrictions and institutional controls, will assist and cooperate with those performing the cleanup and provide access to the Property, will comply with all information requests and administrative subpoenas that have or may be issued in connection with the Property, and will provide all legally required notices.

#### **4. Cleanup Authority and Oversight Structure:**

- a. The remediation will be managed by the County of Summit, Ohio, Department of Administrative Services, whose staff is familiar with environmental investigations and remediation. All work will be performed in accordance with the Ohio EPA Division of Environmental Response and Revitalization Voluntary Action Program under the implementation of Ohio Administrative Code (OAC) 3745-300. Oversight of the remediation work will be completed by an environmental consulting firm, contracted by the County, which is fully qualified in all aspects

December 18, 2015

of assessment and remediation. The environmental consulting firm will utilize a Certified Professional licensed by Ohio EPA to oversee remediation activities.

- b. Access to neighboring properties will not be necessary to complete the proposed cleanup.

**5. Statutory Cost Share:**

- a. The County is not requesting a hardship waiver of the cost share. The 20% (\$40,000) cost share will be provided by the County in the form of money allocated as part of the County's General Fund budget. A letter from the County included in **Appendix B** affirms their ability and intent to provide the required matching funds for this project should the application be successful.

**6. Community Notification:**

The community was notified that the County would be applying for this grant through the County's standard notification process. A notice was placed in the local newspaper (The Akron Beacon Journal) on Monday, November 30, 2015 and on the County website, advertising that the draft proposal, including the Analysis of Brownfields Cleanup Alternatives (ABCA), would be available for review in the Summit County Executive's Offices and on the Summit County website and that a public meeting would be held on December 7, 2015. A copy of the draft proposal, including the ABCA, was placed in the Summit County Administrative Offices and on the Summit County website on November 30, 2015, along with an invitation to the public to provide comments either in writing or by attending the public meeting on December 7, 2015 at 4:30 pm at the Summit County Council Chambers, located at 175 South Main Street, Akron, Ohio. Copies of the Draft ABCA, public notification and solicitation of comments, meeting minutes and sign in sheet are included in **Attachment E** (Community Notification Documentation) and **Attachment F** (ABCA).

## **APPENDIX A OWNERSHIP DOCUMENTATION**

*Deed, PIN 5401864A*

*Deed, PIN 5401864B*

*Deed, PIN 5106284*

STATE OF MISSOURI, CITY OF ST. LOUIS, ss.

BEFORE ME, a Notary Public in and for said County, personally appeared Marie Olivette Sherbondy, who declared herself to be single and unmarried, and who executed the foregoing conveyance and duly acknowledged that she signed and executed the foregoing instrument, and that the same is her free act and deed.

IN TESTIMONY WHEREOF, I have hereunto set my hand and official seal at City of St. Louis, Missouri, this 28th day of May, 1921. My term expires Oct. 27, 1922.

Henry H. Oberschelp,  
Notary Public, City of St. Louis, Mo. (Seal).

Entered for Transfer May 31, 1921.  
Received for Record May 31, 1921, at 3:12 P.M.  
Recorded June 2, 1921.  
Recorder's Fee \$ 1.30

JACOB BAUER, Recorder.

KNOW ALL MEN BY THESE PRESENTS:

#8783

DEED.

From  
Columbiana, Mahoning, Portage and  
Stark Counties for interests in  
Springfield Lake Sanatorium,  
To  
Summit County Commissioners.

KNOW ALL MEN BY THESE PRESENTS: That, WHEREAS, heretofore, by the joint action of the Boards of County Commissioners of Mahoning, Columbiana, Portage, Stark and Summit Counties, in the State of Ohio, said County Commissioners formed themselves into a Joint Board for the purpose of establishing and maintaining a district hospital for the care and treatment of persons suffering from tuberculosis, under the style and name of the Joint Board of County Commissioners of Mahoning, Columbiana, Portage, Stark and Summit Counties, for the purpose of establishing and maintaining a District Tuberculosis Hospital, and,

WHEREAS, said Joint Board did thereafter purchase and take title by deed to the real estate hereinafter described, and erected buildings thereon, and has maintained and operated said District Tuberculosis Hospital under the name of the Springfield Lake Sanatorium, and

WHEREAS, in the judgment of the members of the Joint Board of said District, the facilities of said hospital, as now conducted and operated, are inadequate to meet the needs of all of the counties in said district, and owing to its location and the distance of the counties comprising said district, other than Summit County, therefrom, it is impractical, if not impossible, for such other counties to avail themselves of such facilities and to make such use thereof as their several needs require, and,

WHEREAS, acting under Section 3148, General Code, and the approval of the State Department of Health having been first obtained, it was by resolution duly and unanimously adopted by said Joint Board of County Commissioners of Mahoning, Columbiana, Stark, Summit and Portage Counties, and by resolution duly adopted by each of them, that it would be for the best interest of all of said counties, and for the public good, to withdraw from said district, and to sell all of their respective interests in said District Tuberculosis Hospital to Summit County, and,

WHEREAS, said Summit County acquiesced in said resolution, and is willing to purchase all of the interests of said several counties in the said District Tuberculosis Hospital; and it was further resolved by said Joint Board of County Commissioners of Mahoning, Columbiana, Stark, Summit and Portage Counties, and by each of them, that the President and Secretary of said Joint Board be authorized and directed to execute and deliver a good and sufficient deed for the land hereinafter described, to The Board of County Commissioners of Summit County, Ohio, its successors and assigns, including all of their interests in the said District Tuberculosis Hospital, and,

WHEREAS, Summit County has paid to the several counties the following sums of money, as per agreement entered into between Summit County and said other counties of the said district, for their respective interests in said District Tuberculosis Hospital, to-wit: To Stark County, \$80,011.21; to Mahoning County, \$90,690.29; to Portage County, \$25,068.95 and to Columbiana County, \$44,038.32.

NOW, THEREFORE, IN CONSIDERATION OF THE PREMISES, and in consideration of One Dollar (\$1.00), to it in hand paid, the receipt of which is hereby acknowledged, the Joint Board of County Commissioners of Columbiana, Portage, Stark, Summit and Mahoning Counties, hereby gives, grants, bargains, sells and conveys unto the Board of County Commissioners of Summit County, Ohio, its successors and assigns, the following described real estate:

Situated in the Township of Springfield, County of Summit and State of Ohio, and known as being a part of Tract Number Seven (7), bounded and described as follows:

Beginning at a point in the center of the road on the west line of Tract Number Seven (7), the same being four (4) chains, forty seven (47) links north of the southeast corner of Lot Number four (4) in Tract Number six (6); thence south 89 degrees east, thirty nine (39) chains, 82 links, to a stone; thence south  $\frac{1}{2}$  degree west, 24 chains, 92 links to a stone; thence north 89 degrees west, 40 chains, 10 links to a stone; thence north  $1\frac{1}{4}$  degrees east, 24 chains, 97 links, to the place of beginning, containing ninety nine and 68/100 Acres of land, according to a survey made by Jacob Mishler, January 12th, 1876; being the same premises conveyed to Benjamin Bixler, by deed recorded in Book 169, page 570, of the Records of Deeds of Summit County, State of Ohio, be the same more or less, but subject to all legal highways.

TO HAVE AND TO HOLD the above granted and bargained premises, with the appurtenances thereunto belonging, unto the said Grantee, its successors and assigns, forever. And the said Grantor does for itself, its successors and assigns, covenant with the said Grantee, its successors and assigns, that at and until the ensueing of these presents, it is well seized of the above described premises, as a good and indefeasible estate in fee simple, and has good right to bargain and sell the same in manner and form as above written, and that the same are free from all encumbrances whatsoever; and the said Grantor for itself, its successors and assigns, warrants and defends said premises, with the appurtenances thereunto belonging, unto the said Grantee, its successors and assigns, forever, against all lawful claims and demands whatsoever.

IN WITNESS WHEREOF, the said Joint Board of County Commissioners of Columbiana, Portage, Stark, Summit and Mahoning Counties, for the purpose of establishing and maintaining a District Tuberculosis Hospital, has caused its name to be signed to this instrument, by J. H. Hinchliffe, its President, and Allen Shale, its Secretary, they being duly authorized in the premises, by resolution of said Joint Board, this 23rd day of March, A. D., 1920.

Signed and acknowledged  
in the presence of:

W. A. Spencer           \$240.00  
Walter S. Ruff         S.L.S.  
                              3-23-20

THE JOINT BOARD OF COUNTY COMMISSIONERS OF  
COLUMBIANA, PORTAGE, SUMMIT, STARK AND  
MAHONING COUNTIES, FOR THE PURPOSE OF  
ESTABLISHING AND MAINTAINING A DISTRICT  
TUBERCULOSIS HOSPITAL,

By J. H. Hinchliffe, its President  
Allen Shale, its Secretary

STATE OF OHIO, SUMMIT COUNTY, ss.

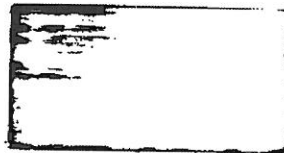
BEFORE ME, a Notary Public in and for said County, personally appeared the above named J. H. Hinchliffe, and Allen Shale, who being by me first duly sworn, say that they are the respective President and Secretary of the Joint Board of County Commissioners of Columbiana, Portage, Stark, Summit and Mahoning Counties, for the District Tuberculosis Hospital, Grantor, and that as such officers, they did sign the foregoing instrument, being duly authorized in the premises by resolution of said Grantor, and that the signing of said instrument is their free act and deed as such officers, and the free act and deed of said Grantor.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal at Springfield Township, Summit County, Ohio, this 23rd day of March, A. D., 1920.

W. A. Spencer,  
Notary Public, (Seal).

Entered for Transfer May 26, 1921.  
Received for Record May 26, 1921, at 9:30 A. M.  
Recorded June 2, 1921.  
Recorder's Fee See Sec. #2983

JACOB BAUER, Recorder.



796880  
O.R. \_\_\_\_\_ PG. 667-669

COUNTY OF SUMMIT  
RECEIVED & RECORDED  
92 DEC 21 AM 8:19  
RALPH JAMES - RECORDER  
FEE \$ 10.00

MAIL TO:

MINNESOTA TITLE  
BOX

DOCUMENT NUMBER

OFFICIAL RECORD  
(DO NOT REMOVE FROM RECORD  
(PAGE 1 OF RECORD)

0R1177-667



**Know All Men by These Presents:** That I

Robert E. Savage, aka Robert Savage, married to Patricia A. Savage

the GRANTOR<sup>s</sup> for the CONSIDERATION of one and other valuableconsideration DOLLARS (\$ 1.00 ) received to my full satisfaction of  
Summit Countywhose address is Ohio Building, 8th Floor, 175 South Main Street, Akron, Ohio  
44308-1314

the GRANTEE, do GIVE, GRANT, BARGAIN, SELL and CONVEY unto the said Grantee, its

heirs and assigns, the following described premises, situated in the Township

Springfield Summit

County of and STATE OF OHIO, and known as

being a part of Tract 7 in said Township and bounded and  
described as follows:

Beginning at a stone at the intersection of the west line of Tract #7 with the center line of the Krumroy-Myersville Road; thence south 87 degrees east 1967.14 feet to an iron stake and the true place of beginning; thence south 87 degrees east 682.86 feet to an iron stake; thence north 3 degrees east 16.5 feet to\*\* south 3 degrees west 125 feet to an iron stake; thence south 87 degrees east 348.40 feet to an iron stake on the west line of the Peerless Allotment as recorded in Plat Book 25, page 65, Summit County Records of Plats; thence south 3 degrees west 402.75 feet to an iron stake; thence north 87 degrees west 494 feet to an iron stake; thence south 3 degrees 15' west 180 feet to an iron stake; thence north 87 degrees west 639.70 feet to an iron stake; thence north 0 degrees 49' west 692.78 feet to an iron stake and the true place of beginning and containing within said boundaries 15.514 acres of land, \*\* an iron stake; thence South 87° East 144.25 feet to an iron stake; thence

Parcel Number 51-06284

Routing Code SP 0031-03-001.000

\*Notary

THE STATE OF OHIO )

)BEFORE ME, a notary public in and for said County,

SUMMIT COUNTY, ss.) personally appeared Robert E. Savage who

acknowledged that he did sign the foregoing instrument, and that the same is his free act and deed.

IN TESTIMONY WHEREOF, I have hereunto set my hand and official seal at Akron, this 18th day of December in the year A. D. 1992.

*Lorenzo Fincher*  
Lorenzo Fincher, Notary  
Dec 10, 1996  
Expiration date

LORENZO FINCHER, Notary Public  
Residence - Summit County  
State Wide Jurisdiction, Ohio  
My Commission Expires Dec. 10, 1998

20161  
TRANSFERRED IN COMPLIANCE WITH  
SEC. 319.202 REV. CODE

\$ EXEMPT FEE  
Consideration  
JAMES B. MCCARTHY  
County Auditor  
By *[Signature]*  
Deputy Auditor

8/809  
MINNESOTA INSURED TITLE  
AGENCY, INC.  
92 East Mill Street  
Akron, Ohio 44308

Description Approved By  
TAX MAP DEPARTMENT

502/31 12-21-92

be the same more or less, but subject to all legal highways subject to restrictions of records, if any,  
TO HAVE AND TO HOLD the above granted and bargained premises with the appurtenances thereof unto  
the said grantee, its heirs and assigns forever. And I the said grantor do for  
myself and my heirs, executors and administrators, covenant with the said grantee,  
its heirs and assigns that at and until the ensembling of these presents I am  
well seized of the above described premises, as a good and indefeasible estate in FEE SIMPLE, and have good  
right to bargain and sell the same in manner and form as above written, and that the same are free from all  
encumbrances whatsoever. (The mortgage to Transamerica Financial Services,  
being recorded at Summit County Recorder's Volume O.R. 804, Page 486,  
in the principal sum of \$18,749.86 is to be paid out of the proceeds  
of this sell on 12/18/92 by the grantor.)

and that I will WARRANT AND DEFEND SAID PREMISES, with the appurtenances thereunto  
belonging to the said Grantee, Summit County, its heirs and assigns, against all lawful  
claims and demands whatsoever.

And I, the said Patricia A. Savage spouse (wife)  
of said Robert E. Savage  
do hereby remise, release, and forever quit-claim, unto the said Grantee, its heirs and assigns, all  
my right and title of DOWER in the above described premises.  
IN WITNESS WHEREOF, we hereunto set our hand this 17th day of  
December in the year of our Lord, One Thousand Nine Hundred and Ninety-two

Signed and Acknowledged in Presence of \*

Robert E. Savage  
Robert E. Savage  
Patricia A. Savage  
Patricia A. Savage

THE STATE OF OHIO } BEFORE ME, a Notary Public in and  
Lucas County, ss. } for said County, personally appeared

PATRICIA A. SAVAGE  
that I did sign the foregoing instrument, and that the same is MY free act and deed.  
IN TESTIMONY WHEREOF, I have hereunto set my hand and official seal, at Lucas County, Ohio  
this 17 day of DECEMBER in the year A. D. 1992

7-25-94

Robert E. Kottmann

This instrument prepared by Caroline Williams, Attorney at Law  
1621 Flickinger Road

\* See notary for Robert E. Savage signature on the reverse side.

Warranty Deed

FROM

Robert E. Savage

TO

Summit County

RECEIVED FOR RECORD

19

M.

at o'clock

19

Recorded

in County Records,

Page

Volume

Recorder.

ENTERED FOR TRANSFER

19

PUBLISHED BY LONG PRINTING CO., AKRON, OHIO

081177-669

## **APPENDIX B**

### **COST SHARE DOCUMENTATION**



# COUNTY OF SUMMIT, OHIO

Russell M. Pry, Executive

175 S. Main Street • Akron, Ohio 44308-1308 • 330.643.2510 • fax: 330.643.2507 • www.co.summit.oh.us

December 18, 2015

Mr. Matthew Didier  
U.S. Environmental Protection Agency Region 5  
77 West Jackson Boulevard  
Mail Code SE-7J  
Chicago, Illinois 60604-3507

**RE: Cost Share for Brownfields Cleanup Grant Application  
Former Edwin Shaw Hospital Property  
Village of Lakemore, Summit County, Ohio**

Dear Mr. Didier:

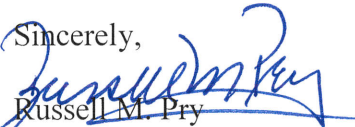
As part of the County of Summit, Ohio (the "County") application for a FY2016 Brownfields Cleanup Grant for the Former Edwin Shaw Hospital Property located in the Village of Lakemore, Summit County, Ohio, the County presents the following information regarding the cost share requirement. The County will provide the required 20% cost share (totaling \$40,000) in the form of money to fund the proposed cleanup at the Property. In addition, the County will provide money above the required cost share in the sum of approximately \$1.6 million for demolition and abatement of asbestos and mercury at the Property which will commence prior to award of the grant.

The County has a strong track record of successfully leveraging funds to meet financial needs of all stages of Brownfields redevelopment. The County and its community partners have already leveraged funding, for the assessment and remedial action plan for this distressed and underutilized property. Again, the County has marshalled \$1.6 million of its resources for remediation and demolition services at the site. The County is working with the Summit County Land Bank to obtain up to \$750,000 to offset this amount.

This redevelopment project will address the significant public health threat to the Village of Lakemore posed by the environmental conditions and the criminal activities at this site. This project aligns with the County's comprehensive approach to brownfields redevelopment to provide environmental benefits by fostering cleaner, healthier communities, economic benefits in creating/retaining jobs, enhancing local economies, and social benefits through promoting sustainable, vibrant, and more equitable communities.

Thank you in advance for your time and consideration.

Sincerely,

  
Russell M. Pry  
Summit County Executive

**ATTACHMENT B**  
**LETTER FROM STATE ENVIRONMENTAL AUTHORITY**





John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

November 24, 2015

U.S. Environmental Protection Agency, Region 5  
ATTN: Matthew Didier  
77 West Jackson Blvd., Mail Code SE-7J  
Chicago, IL 60604-3507

**RE: County of Summit Cleanup Grant Proposal**

Dear Mr. Didier:

I am pleased to offer Ohio EPA's support for the County of Summit Cleanup Grant Proposal. The County is applying for a cleanup grant totaling \$200,000 to address hazardous and petroleum substance contamination. We have worked with the County of Summit in the past and hope to be able to provide support to the County under the Assessment, Cleanup and Revolving Loan Fund Grant program established by the Small Business Liability Relief and Brownfield Revitalization Act (P.L. 107-118).

The funding the County of Summit is requesting under their cleanup grant proposal will be used to clean up the Former Edwin Shaw Hospital Property. Historically the Property was developed in 1915 as a tuberculosis hospital, which also operated a powerhouse, laundry, underground storage tanks, and numerous residential cottages. Ohio EPA completed a Phase I Targeted Brownfield Assessment of the property in 2010, and since then a Phase II Property Assessment, Asbestos Survey, Mercury Screening Report, and preliminary Remedial Action Plan have been completed. The property has been vacant since 2009 and significant criminal activity has taken place at the property. If awarded, this cleanup grant would allow the County to clean this site, thus protecting the surrounding communities and allowing for redevelopment of the parcel.

We look forward to working with the County of Summit and U.S. EPA on this project. If you have any questions, please do not hesitate to contact me at 614-644-2285.

Sincerely,

Amy Yersavich, Manager  
Ohio Environmental Protection Agency  
Site Assistance and Brownfield Revitalization

cc: Deborah S. Matz, Director, Department of Law, Insurance and Risk Management, County of Summit  
Rod Beals, Ohio EPA, DERR/NEDO

## **ATTACHMENT C**

### **LETTERS OF COMMITMENT**



#### BOARD OF DIRECTORS

KRISTEN M. SCALISE CHAIR

ILENE SHAPIRO VICE CHAIR

RUSSELL M. PRY

MARCO SOMMERVILLE

HELEN HUMPHRYS

JERRY FEEMAN

FRED WRIGHT

PATRICK BRAVO  
EXECUTIVE DIRECTOR

175 S Main St, Suite 207  
Akron, OH 4430  
330.643.2546

[SUMMITLANDBANK.ORG](http://SUMMITLANDBANK.ORG)

November 23, 2015

Mr. Russell M. Pry, County Executive  
County of Summit, Ohio  
175 South Main Street  
8th floor  
Akron, Ohio 44308

RE: Support for and Commitment to the County of Summit, Ohio,  
Former Edwin Shaw Hospital Property and  
Pursuit of a FY2016 U.S. EPA Brownfields Cleanup Grant

Dear Mr. Pry,

This letter expresses the Summit County Land Bank's strong support for and commitment to assisting with planning and implementation of the County of Summit, Ohio (County) FY2016 United States Environmental Protection Agency (U.S. EPA) Brownfields Cleanup Grant applications for the Former Edwin Shaw Hospital Property project.

The assistance provided by the Cleanup grant will enable the remediation of a vacant, blighted and contaminated site in the County, and provide a permanent remedy to existing hazardous and petroleum substance contamination. This will render this property safe for redevelopment, to reduce unemployment, boost the local tax base, improve public health, and enhance environmental quality. This project serves as an integral part of the County's development strategy.

The successful redevelopment of the Property is critically important to the future of both the local community and the County's proposed development projects. As such, the Summit County Land Bank is prepared to make a financial commitment toward the removal of blight at the former Edwin Shaw Hospital property, a current proposal for which includes up to \$750,000 in demolition costs. In addition, the Summit County Land Bank will assist the County with conducting outreach to engage local residents and community leaders, including information regarding the cleanup project in the Summit County Land Bank's printed documents and bulletins.

As agent for County of Summit in the reclamation, rehabilitation and reutilization of abandoned, vacant and blighted property in Summit County, the mission of the Summit County Land Bank is to support neighborhood and community reinvestment and economic development efforts in order to revitalize neighborhoods, stabilize property values, reduce blight, return property to productive use, and improve the quality of life in our community. With the





#### BOARD OF DIRECTORS

KRISTEN M. SCALISE CHAIR

ILENE SHAPIRO VICE CHAIR

RUSSELL M. PRY

MARCO SOMMERVILLE

HELEN HUMPHRYS

JERRY FEEMAN

FRED WRIGHT

PATRICK BRAVO  
EXECUTIVE DIRECTOR

175 S Main St, Suite 207  
Akron, OH 4430  
330.643.2546

[SUMMITLANDBANK.ORG](http://SUMMITLANDBANK.ORG)

support of the U.S. EPA Brownfields Cleanup Grant, the County will have the opportunity to eliminate a significant threat to the public health and safety by removing substantial blight and mitigating environmental concerns through the removal of hazardous substance contamination, while enhancing the community and providing an opportunity for future development and job creation.

We strongly support the County's grant application and are committed to assisting in the planning and implementation of the Cleanup project if the grants are awarded. We hope the U.S. EPA will seize this opportunity to work with and assist this first time grant applicant. The Cleanup grant would represent a significant step toward redevelopment of the Property for valuable reuse.

Thank you for your consideration of the County's Brownfields Cleanup Grant application.

Sincerely,

Patrick L. Bravo  
Executive Director

# NEFCO

## NORTHEAST OHIO FOUR COUNTY REGIONAL PLANNING & DEVELOPMENT ORGANIZATION

175 South Main Street, Room 211  
Akron, Ohio 44308-1308

(330) 643-8514 • Fax (330) 643-5046  
www.nefcoplanning.org

*Richard Regula, Chairman*

*Joseph Hadley Jr., Executive Director*  
November 17, 2015

Mr. Russell M. Pry, County Executive  
County of Summit, Ohio  
175 S. Main Street, 8<sup>th</sup> Floor  
Akron, OH 44308

**SUBJECT: Support for and Commitment to the County of Summit, Ohio, Former Edwin Shaw Hospital Property and Pursuit of a FY2016 U.S. EPA Brownfields Cleanup Grant**

Dear Mr. Pry:

NEFCO strongly supports the County of Summit's application for an FY2016 United States Environmental Protection Agency (U.S. EPA) Brownfields Cleanup Grant for the Former Edwin Shaw Hospital Property project. This property was the first site assessed under NEFCO's FY12 U.S. EPA Brownfields Assessment Coalition grant, and NEFCO recently funded the preparation of an Analysis of Brownfields Cleanup Alternatives to assist with the submittal of this application to the U.S. EPA.

Summit County is highly urbanized, and large properties that are ready for development are rare. The former Edwin Shaw Hospital is a 100-acre site with proximity to major roads and an airport, and it will provide the County with significant economic development potential upon its cleanup. Furthermore, this property is located in the Village of Lakemore, which in recent years has experienced fiscal distress. The loss of jobs which occurred when this facility closed created a financial hardship for the Village, and maintenance of the site, a target for vandals, places a great burden on the county. The property also contains the Edwin Shaw Rehabilitation Institute Golf Course, the first facility in the U.S. designed specifically for persons with disabilities. It has become a model for similar programs, both nationally and internationally. Remediating this property will address issues of safety and health for golf course patrons.

Redevelopment will support the goals of the Northeast Ohio Sustainable Communities Consortium, an effort funded by the U.S. Department of Housing and Urban Development. Two such goals are to improve fiscal health and to strengthen established communities. Assistance provided by the cleanup grant will also emphasize NEFCO's commitment to the reuse of vacant, blighted and contaminated sites in the County, and will leverage federal dollars that were invested with the phase II investigation of this property in 2013. NEFCO will continue to assist the County in its efforts to return the former Edwin Shaw Hospital to productive use. Such assistance might be in the form of additional investigations that might be needed to determine remedial actions.

We strongly support the County's grant application and are committed to assisting in the planning and implementation of the Cleanup project if the grants are awarded. We hope the U.S. EPA will seize this opportunity to work with and assist this first time grant applicant. The Cleanup grant would represent a significant step toward redevelopment of the Property for valuable reuse.

Thank you for your consideration of the County's Brownfields Cleanup Grant application.

Sincerely,



Richard Regula  
NEFCO Chairman

Pc: Craig Stanley



Northeast Ohio Sustainable Communities Consortium  
1299 Superior Avenue  
Cleveland, OH 44114-3204  
216-241-2414 extension 370 (W) | 216-621-3024 (F)  
[www.neoscc.org](http://www.neoscc.org)

December 17, 2015

Mr. Russell M. Pry, County Executive  
County of Summit, Ohio  
Law, Insurance & Risk Management  
175 South Main Street  
Akron, Ohio 44308

**RE: Letter of Support for the Former Edwin Shaw Hospital Property's U.S. EPA cleanup grant application and Verification of Participation by Summit County, Ohio, with NEOSCC, recipient of a Partnership for Sustainable Communities Regional Planning Grant**

Dear County Executive Pry,

The Northeast Ohio Sustainable Communities Consortium (NEOSCC) is pleased to confirm our support of the County of Summit's application to the U.S. Environmental Protection Agency (U.S. EPA) for a Brownfields Cleanup Grant. It is our understanding that Summit County will be submitting an application for a \$200,000 Brownfields Cleanup grant from the FY2016 U.S. EPA Brownfields Cleanup grant program.

This letter demonstrates the NEOSCC's support for the County's application and its plans to clean up the former Edwin Shaw Hospital based on the project's consistency with the Livability Principles cited in the original sustainable communities NOFA and the specific recommendations developed by the NEOSCC Vibrant NEO 2040 Plan.

The remediation of brownfield properties is an important tool for revitalizing and strengthening communities in Northeast Ohio. Brownfield redevelopment leads to job creation and retention, and addresses the disparate and negative effects of brownfields on underprivileged populations. The Village of Lakemore, where the former hospital is located, has been in fiscal distress and is home to a large elderly population. Returning vacant properties like the former Edwin Shaw Hospital would greatly assist this community.

Furthermore, this letter serves as documentation that Summit County is a member of the NEOSCC, which, through the Northeast Ohio Areawide Coordinating Agency (NOACA) acting as fiscal agent, was the recipient of a FY 2010 \$4.25 million Sustainable Communities Regional Planning Grant from the U.S. Department of Housing and Urban Development as part of the HUD-DOT-EPA Partnership for Sustainable Communities. NEOSCC was formed as a nonprofit organization to lead a regional planning effort encompassing the 12 counties of Northeast Ohio, including Summit County. Significant work was undertaken as part of this initiative to develop a regional vision and framework for the sustainable future

of Northeast Ohio. Receiving a brownfield cleanup grant will directly support one of nine major recommendations of the NEOSCC's Vibrant NEO 2040 Vision – to “pursue the remediation, assembly, marketing, and redevelopment of abandoned properties at both the local and regional levels.”

EPA's support of this project would likewise support several of the Livability Principles that also underpin the Vibrant NEO 2040 Vision document, including:

- Promotes equitable, affordable housing – the former Edwin Shaw property may very likely be redeveloped as residential, as suggested by the realtors who have visited the site.
- Supports existing communities – target areas within Summit County are largely located in neighborhoods or communities that have experienced disinvestment. The property was once a large employer for the Village, but is no longer after the Edwin Shaw Hospital's services were relocated.
- Enhances communities and neighborhoods – this project will promote sustainable redevelopment to remove blight and health hazards.

Please feel free to direct any questions to me regarding NEOSCC's support of this grant application.

Sincerely,



Grace Gallucci  
Executive Director  
NOACA



November 23, 2015

Mr. Russell M. Pry, County Executive  
County of Summit, Ohio  
175 South Main Street  
8<sup>th</sup> floor  
Akron, Ohio 44308

**RE: Support for and Commitment to the County of Summit, Ohio,  
Former Edwin Shaw Hospital Property and  
Pursuit of a FY2016 U.S. EPA Brownfields Cleanup Grant**

Dear Mr. Pry,

This letter expresses the DFA's strong support for and commitment to assisting with planning and implementation of the County of Summit, Ohio (County) FY2016 United States Environmental Protection Agency (U.S. EPA) Brownfields Cleanup Grant applications for the Former Edwin Shaw Hospital Property project.

The assistance provided by the Cleanup grant will enable the remediation of a vacant, blighted and contaminated site in the County, and provide a permanent remedy to existing hazardous and petroleum substance contamination. This will render this property safe for redevelopment, to reduce unemployment, boost the local tax base, improve public health, and enhance environmental quality. This project serves as an integral part of the County's development strategy.

The successful redevelopment of the Property is critically important to the future of both the local community and the County's proposed development projects. The DFA has experience with brownfield remediation projects involving Good Year, Lockheed Martin, the Barberton Development Corporation, and the City of Akron. The DFA is able to provide financial assistance in numerous ways.

We strongly support the County's grant application and are committed to assisting in the planning and implementation of the Cleanup project if the grants are awarded. We hope the U.S. EPA will seize this opportunity to work with and assist this first time grant applicant. The Cleanup grant would represent a significant step toward redevelopment of the Property for valuable reuse.

Thank you for your consideration of the County's Brownfields Cleanup Grant application.

Sincerely,

Chris Burnham,  
President



# Summit County Public Health

1867 West Market Street ♦ Akron, Ohio 44313-6901  
Phone: (330) 923-4891 ♦ Toll-free: 1 (877) 687-0002 ♦ Fax: (330) 923-7558  
[www.scphoh.org](http://www.scphoh.org)

December 2, 2015

Mr. Russell M. Pry, County Executive  
County of Summit, Ohio  
Department of Administrative Services  
2525 State Road  
Cuyahoga Falls, Ohio 44223

**RE: Support for and Commitment to the County of Summit, Ohio,  
Former Edwin Shaw Hospital Property and  
Pursuit of a FY2016 U.S. EPA Brownfields Cleanup Grant**

Dear Mr. Pry:

This letter expresses Summit County Public Health's strong support for and commitment to assisting with planning and implementation of the County of Summit, Ohio (County) FY2016 United States Environmental Protection Agency (U.S. EPA) Brownfields Cleanup Grant applications for the Former Edwin Shaw Hospital Property project.

The assistance provided by the cleanup grant will enable the remediation of a vacant, blighted and contaminated site in the County, and provide a permanent remedy to existing hazardous and petroleum substance contamination. This will render this property safe for redevelopment, reduce unemployment, boost the local tax base, improve public health, and enhance environmental quality. This project serves as an integral part of the County's development strategy.

The successful redevelopment of the property is critically important to the future of both the local community and the county's proposed development projects. As such, Summit County Public Health will assist the county with outreach to the local residents and community leaders, provide expert advice as requested and provide assistance with risk communication, including information regarding the cleanup project in organization's printed documents and bulletins.

Summit County Public Health's mission and goals are supported by this project. Specifically it is a project that will improve the neighborhood for an area with socioeconomic challenges. Additionally a strategic goal is for our agency to assume a leadership role in the community to address the health impact the built environment has on public health through advocacy, policy that supports land use planning, and the impacts of climate change. The removal of the hazardous buildings and hazardous substances on the Edwin Shaw property will support public health and redevelopment that is sorely needed.

We strongly support the county's grant application and are committed to assisting in the planning and implementation of the cleanup project if the grants are awarded. We hope the U.S. EPA will seize this opportunity to work with and assist this first time grant applicant. The cleanup grant would represent a significant step toward redevelopment of the property for valuable reuse.

Thank you for your consideration of the County's Brownfields Cleanup Grant application.

Sincerely,

A handwritten signature in blue ink that reads "Donna R. Skoda".

Donna Skoda, M.S., R.D., L.D.  
Health Commissioner

## **ATTACHMENT D**

### **DOCUMENTATION OF LEVERAGE FUNDS**





# COUNTY OF SUMMIT, OHIO

Russell M. Pry, Executive

175 S. Main Street • Akron, Ohio 44308-1308 • 330.643.2510 • fax: 330.643.2507 • [www.co.summit.oh.us](http://www.co.summit.oh.us)

December 18, 2015

Mr. Matthew Didier  
U.S. Environmental Protection Agency Region 5  
77 West Jackson Boulevard  
Mail Code SE-7J  
Chicago, Illinois 60604-3507

**RE: Cost Share for Brownfields Cleanup Grant Application  
Former Edwin Shaw Hospital Property  
Village of Lakemore, Summit County, Ohio**

Dear Mr. Didier:

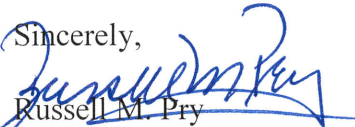
As part of the County of Summit, Ohio (the "County") application for a FY2016 Brownfields Cleanup Grant for the Former Edwin Shaw Hospital Property located in the Village of Lakemore, Summit County, Ohio, the County presents the following information regarding the cost share requirement. The County will provide the required 20% cost share (totaling \$40,000) in the form of money to fund the proposed cleanup at the Property. In addition, the County will provide money above the required cost share in the sum of approximately \$1.6 million for demolition and abatement of asbestos and mercury at the Property which will commence prior to award of the grant.

The County has a strong track record of successfully leveraging funds to meet financial needs of all stages of Brownfields redevelopment. The County and its community partners have already leveraged funding, for the assessment and remedial action plan for this distressed and underutilized property. Again, the County has marshalled \$1.6 million of its resources for remediation and demolition services at the site. The County is working with the Summit County Land Bank to obtain up to \$750,000 to offset this amount.

This redevelopment project will address the significant public health threat to the Village of Lakemore posed by the environmental conditions and the criminal activities at this site. This project aligns with the County's comprehensive approach to brownfields redevelopment to provide environmental benefits by fostering cleaner, healthier communities, economic benefits in creating/retaining jobs, enhancing local economies, and social benefits through promoting sustainable, vibrant, and more equitable communities.

Thank you in advance for your time and consideration.

Sincerely,

  
Russell M. Pry  
Summit County Executive



**ATTACHMENT E**  
**DOCUMENTATION OF**  
**COMMUNITY NOTIFICATION**



COUNTY OF SUMMIT  
THE HIGH POINT OF OHIO  
RUSSELL M. PRY, EXECUTIVE

#### **A PUBLIC MEETING**

To discuss the County of Summit's application for a U.S. EPA Brownfields Cleanup Grant for its Edwin Shaw Hospital Demolition Project. The meeting will be held Monday, December 7, 2015 at 4:30 p.m. in the Summit County Council Chambers, on the 7th floor of the Ohio Building located at 175 S. Main Street, Akron, Ohio. The County will apply for a grant to assist in funding necessary cleanup of the Edwin Shaw Hospital and out buildings prior to demolition. A draft of the grant application will be available for review and public comment on the County website at [www.co.summitoh.net](http://www.co.summitoh.net) and in the offices of the County Executive on the 8th floor of the Ohio Building, 175 South Main Street, Akron, Ohio.

See the Legal Notice in today's paper about the Public Comment Period.

Contact Deb Matz with questions,  
[dmatz@summitoh.net](mailto:dmatz@summitoh.net)

## PUBLIC NOTICE

The County of Summit is applying for a Brownfields Cleanup Grant from the United States Environmental Protection Agency for the Edwin Shaw Hospital Demolition project. The project will take place at 1621 Flickinger Road, Akron, Ohio, 44312. The draft grant proposal including a copy of the Draft Analysis of Brownfields Cleanup Alternatives (ABCA) for the project will be available for public review and comment at the offices of the Summit County Executive located in the Ohio Building, 175 South Main Street, 8th floor, Akron, Ohio 44308. Parking is available in the County Parking Deck located on High Street across the street from the Summit County Courthouse, parking tickets will be validated so parking is free. The plans will be available from December 7 through December 10, 2015. A public meeting to discuss written comments received and to solicit additional comments to the grant proposals will be held on Monday, December 7, 2015 at 4:30 p.m. in Summit County Council chambers, located on the 7th floor of the Ohio Building, 175 South Main Street, Akron, Ohio 44308. Any questions may be directed to Deb Matz, Director, Department of Law, Insurance and Risk Management, County of Summit, [dmatz@summitoh.net](mailto:dmatz@summitoh.net)

County of Summit  
Russell M. Pry, County  
Executive

Nov 30

## The County of Summit Department of Communications, Russell M. Pry, Executive

- [CLERK OF COURTS](#)
- [COUNTY COUNCIL](#)
- [COURTS](#)
  - [COMMON PLEAS](#)
  - [DOMESTIC RELATIONS](#)
  - [JUVENILE COURT](#)
  - [NINTH DISTRICT](#)
  - [PROBATE](#)
- [ENGINEER](#)
- [EXECUTIVE](#)
- [FISCAL](#)
- [PROSECUTOR](#)
- [SHERIFF](#)

Welcome to the Summit County Website! Have a Happy and Safe Holiday Season!



COUNTY OF SUMMIT



THE HIGH POINT OF OHIO

Welcome to The County of Summit Government website! The website will give you an opportunity to get to know your local government and the highest point along the Ohio and Erie Canal. We hope you enjoy your visit!



**LATEST NEWS:** A public meeting will be held to discuss the County of Summit's application for a U.S. EPA Brownfields Cleanup Grant for its Edwin Shaw Hospital Demolition Project. The meeting will be held Monday, December 7, 2015 at 4:30 p.m. in the Summit County Council Chambers, on the 7th floor of the Ohio Building located at 175 S. Main Street, Akron, Ohio. Parking in the County Parking Deck is available and will be free with a validation stamp. [Draft Grant Application](#), [2016 Dog Licenses Go On Sale December 1st](#), [Every Available Animal Placed In New Homes During the 6th Annual Adopt-A-Thon](#), [County of Summit, along with Eleven Community Partners, Create New Program, Circle of Care, to Serve Elders Who are Subject to Abuse, Neglect and Exploitation](#), [Summit County Executive Russ Pry and Twinsburg Chamber of Commerce Host Economic Development Forum](#) State Representative Kristina Roegner to attend, [County Executive Russ Pry Rotates Room with a View Art](#), [September through December Exhibit Features Local Art Student](#)

PROPERTY

- [Appraisal/Tax Information](#)
- [Average Home Sales](#)
- [Parcel Research Maps](#)
- [Personal Property](#)
- [Tax Levy Information](#)
- [Tax Rates](#)
- [Tax Reduction/Exemption](#)

DEVELOPMENT

- [Department of Development](#)
- [Building Standards](#)
- [Commercial / Industrial Parks](#)
- [Convention & Visitors Bureau](#)
- [Development Finance Authority](#)
- [Fuel Fund](#)



**\*PUBLIC HEARING MINUTES\***

**BROWNFIELDS CLEANUP GRANT APPLICATION FOR EDWIN SHAW**

**December 7, 2015 @ 4:30 p.m. Council Chambers**

**Call to Order:** Council President Ilene Shapiro called the meeting to order at 4:32 pm.

**Open the public hearing:** The Public Hearing was required for the proposal for the Brownfields Cleanup Grant for the former Edwin Shaw Hospital property.

**Representative from the Executive's Office:**

- Jason Dodson gave a short summary statement on behalf of the County Executive outlining the purpose of the application and the overall project that is being proposed for Edwin Shaw.
- John Garvey of Partners Environmental Consulting presented a PowerPoint fully explaining the grant application and the proposed use of the funds. This is a National Grant. The application will be submitted this month, funds will be awarded in May of 2016 and funds will be available in October of 2016.
- Sylvia R. Chinn-Levy, NEFCO Program Manager for Economic Development Planning was present.
- **Proponents:** NONE.
- **Opponents:** NONE.

**Closing Remarks:** A legal notice was published in the Beacon Journal on November 30, 2015 providing notice regarding this public hearing.

Mr. Crawford proposed that Council tour the grounds in the near future.

**Adjournment:** The Public Hearing adjourned at 4:58 pm.

I hereby certify that the foregoing is a true and correct copy of Public Hearing Minutes as taken from the records on file in the office of the County of Summit Council.

\_\_\_\_\_  
Clerk of Council



**COUNCIL OF COUNTY OF SUMMIT**  
Ohio Building  
175 S. Main Street  
Akron, Ohio 44308-1314



RUSSELL M. PRY, EXECUTIVE

# U.S. EPA Brownfield Clean-up Grant

# Community Meeting Sign-in Sheet

Former Edwin Shaw Hospital, 2600 Sanitarium Road, Village of Lakemore, Ohio

Name	Address or E-Mail	How did you hear about it?
Sylvia Chunn-Levy	NEFCO 175 S. Main Rm 211 <del>Akron OH 44308</del> Landbank	- Akron Beacon Journal Ad <input checked="" type="checkbox"/> Other
Patrick Bravo	175 S. Main St. Suite 207 Akron OH 44308	- Akron Beacon Journal Ad <input checked="" type="checkbox"/> Other
		- Akron Beacon Journal Ad - Other
		- Akron Beacon Journal Ad - Other
		- Akron Beacon Journal Ad - Other
		- Akron Beacon Journal Ad - Other
		- Akron Beacon Journal Ad - Other

**ATTACHMENT F**  
**DRAFT ANALYSIS OF BROWNFIELD**  
**CLEANUP ALTERNATIVES (ABCA)**

November 23, 2015

## **Introduction & Background**

The site for this grant application is a portion of the area known as the Former Edwin Shaw Hospital Property. For this Cleanup Grant request (RFP NO: EPA-OSWER-OBLR-15-06), the site consists of Permanent Parcel Numbers (PPN) #5401864(A) and (B) and #5106284, with an address of 2600 Sanitarium Road, Lakemore, Ohio (Property). The Former Edwin Shaw Hospital Property is approximately 104 acres in size. The portion of the Property addressed by the Analysis of Brownfields Cleanup Alternatives (ABCA) is limited to the former facility buildings areas on the 76.90 acres of PPN #5401864 that is located on the southeast corner of the intersection of Sanitarium Road and Flickinger Road.

The Property was the location of a tuberculosis hospital and associated support buildings (Power House, Laundry Building, Treatment Center Building, and 13 cottages). The Main Hospital Building and supporting buildings (Power House Building and Laundry Building) were originally constructed in 1908 as a five (5)-county tuberculosis hospital facility and was later used as a rehabilitation hospital. Numerous additions to the Main Hospital Building have occurred from 1923 to 1984. The Treatment Center Building was constructed in the early 1920s to treat adolescent tuberculosis patients and later used as a home for abused and abandoned children, and then as a chemical dependency treatment facility. In addition, 13 residential cottages were constructed in the 1960's to house abused and abandoned children and later used as chemical dependency rehabilitation facilities. Two (2) of the cottages have been demolished, although the year of demolition is not known. A production water well is located west of and adjacent to the Power House building.

The buildings on the Property are currently unoccupied and the ongoing maintenance and monitoring of the Property costs the local safety forces and County up to \$240,000 per year. The buildings are planned for demolition and the Property is planned to be redeveloped for commercial or institutional purposes. The asbestos abatement, PCB and mercury clean-up, and demolition activities are planned for early 2016 and the cleanup activities presented in this Analysis of Brownfields Cleanup Alternatives (ABCA) are planned for the last quarter of 2016.

This ABCA has been prepared for use by the County of Summit, Ohio (the County).

## **Previous Assessment**

Partners was provided previous environmental documents including a *Phase I Environmental Site Assessment, Edwin Shaw Hospital, 2600 Sanitarium Road, Lakemore, Ohio 44312* prepared by Tetra Tech EM, Inc. and dated September 2010; a Memorandum titled *Additional Recognized Environmental Conditions (RECs), Former Edwin Shaw Hospital, Lakemore, Ohio* prepared by KU Resources, Inc. and dated October 14, 2011; a correspondence titled *Edwin Shaw Phase I Summary* prepared by Nancy Zikmanis of the Ohio EPA and dated March 27, 2013, maps and descriptions of buildings, a facility timeline from the Akron General Medical Center website and historical information regarding a cemetery.

Based on the review of the provided information, Partners defined the following areas for additional investigation: Power House Building, Laundry Building, Main Hospital Building, Treatment Center Building, Area by the northwest corner of the Power House Building, the 13 Cottages, and Exterior Soils around the North Water Tower.

In August and September 2013, an Ohio Environmental Protection (EPA) Voluntary Action Program (VAP) Phase II Property Assessment was completed to evaluate the site for any potential releases of hazardous substances or petroleum which may have occurred. The VAP Phase II work that was completed on the Property included the installation of 42 soil borings, 24 shallow soil composite locations, and two (2) groundwater monitoring wells. Soil and groundwater samples were collected and submitted for laboratory analyses for one (1) or more of the following volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polynuclear aromatic hydrocarbons (PAHs), Resource Conservation and Recovery Act (RCRA) Metals, Total Petroleum Hydrocarbons (TPH), and polychlorinated biphenyls (PCBs). The VAP Phase II work also included the collection of 11 concrete samples and 11 wipe samples for PCB analyses. A mercury visual inspection and vapor screening was conducted in specified rooms/areas of various buildings at the Property. The work also included an



November 23, 2015

asbestos survey of the buildings on the Property. A total of 788 samples of potential asbestos containing materials (ACM) were collected from the hospital building, cottages, and outbuildings on the Property.

### **Findings of Previous Assessment**

Soil analytical results indicated lead and VOCs are present in soils at concentrations above Ohio Environmental Protection Agency (EPA) Voluntary Action Program (VAP) comparison standards.

Lead was detected in soil at zero (0) to one (1) feet below ground surface (bgs) at concentrations exceeding VAP comparison standards at the following:

- Power House Building: Lead exceeded the Ohio VAP Generic Direct Contact Standard (GDCS) for Residential Land Use and Construction/Excavation Activities (400 milligrams per kilogram [mg/kg]) at CPH-02 (414 mg/kg) and the Ohio EPA Leach-Based Soil Standard (89 mg/kg) at CPH-02 and CHP-01 (389 mg/kg);
- Laundry Building: Lead exceeded the GDCS for Residential Land Use and Construction/Excavation Activities (400 mg/kg) and Leach-Based Soil Standard (89 mg/kg) at CLA-01 (572 mg/kg) and CLA-02 (572 mg/kg);
- Treatment Center Building: Lead exceeded the GDCS for Residential Land Use and Construction/Excavation Activities (400 mg/kg) and Leach-Based Soil Standard (89 mg/kg) at C-DOB (413 mg/kg); and
- Exterior Soils around the North Water Tower: Lead exceeded the GDCS for Residential Land Use and Construction/Excavation Activities (400 mg/kg) at CNWT-03 (825 mg/kg) and the Leach-Based Soil Standard (89 mg/kg) at CNWT-01, CNWT-01 (337 mg/kg), and CNWT-02 (284 mg/kg).

VOCs were detected in soil at concentrations exceeding VAP comparison standards at the Power House Building, Treatment Center Building, and the Area by the northwest corner of the Power House Building.

Groundwater results indicated that no contaminants of concern were found above VAP unrestricted potable use standards except for arsenic in the production well located on the Property. Arsenic is naturally occurring background metal commonly found in soil and groundwater. Previous testing indicated that arsenic was not detected in the potable water from the production well after it was treated. Because arsenic is a naturally occurring metal and with treatment does not impact the potable water, no remedies are anticipated to address arsenic in groundwater.

The PCB wipe sampling analytical results from the IA-4 Main Hospital Building elevator equipment indicated exceedances of the toxic substance control act (TSCA) action level for non-porous material destined for low-contact residential/commercial use. The PCB exceedances are being addressed as part of the preparation work prior to the demolition of the Main Hospital Building.

Mercury was observed in some of the survey areas including the laboratory of the Main Hospital Building and the Power House Building. Mercury vapors were elevated in the morgue and laboratory areas of the Main Hospital Building and in the Power House Building. The mercury is being addressed as part of the preparation work prior to the demolition of the Main Hospital Building and the Power House Building.

The asbestos surveys and associated sampling indicated asbestos containing material (ACM) is present in all of the buildings associated with the Property. The ACM is being addressed as part of the preparation work prior to the demolition of the structures on the Property.

### **Evaluation of Cleanup Alternatives and Costs**

To address soil contamination at the Property at Power House, Main Hospital Building, Treatment Center Building, and Exterior Soils around the North Water Tower, three (3) alternatives were considered, including Alternative #1: No Action, Alternative #2: Capping, and Alternative #3: Limited Excavation with Ohio EPA VAP No Further Action (NFA) process to obtain a Covenant Not To Sue from the Ohio EPA.

#### Alternative #1 – No Action

With this alternative, the County would take no action to remediate the Property.

1. Effectiveness – The No Action alternative would not facilitate re-use of the Property.
2. Implementability – This alternative is implementable, but would require Occupational Safety and Health Administration (OSHA) notifications to workers and would leave groundwater at risk as well.
3. Resilience – This alternative would be resilient to reasonably foreseeable changing climate conditions (i.e., severe thunderstorms, excess summer rains, winter storms, and heavy precipitation events). The Property is not located within a floodplain or in close proximity to any large bodies of water (lakes or rivers) to be affected by changing water levels.
4. Cost – There would be no cost for the No Action alternative.

#### Alternative #2 – Capping

With this alternate, the County will seek issuance of a No Further Action letter from an Ohio EPA VAP Certified Professional (CP) and may seek a Covenant Not to Sue (CNS) for the Property. A Remedial Investigation (RI) will be conducted to further delineate the lateral extent of impacts to determine the size of the soil cap at each area. After completion of the RI defining the capping limits, approximately two (2) feet of clean soil will be placed over each area.

The impacted areas and the planned capping areas are the following:

- Power House Building – lead impacted soils in a 10 foot wide strip around the northern and eastern perimeter of the building (10 feet by 144 feet) and VOC impacted soils from the eastern side of the building (20 feet by 40 feet). The limits of the planned capping areas for the lead and VOC impacted areas would be 30 feet by 164 feet and 40 feet by 60 feet, respectively.  
  
VOC impacted soils from an area of the northwest corner of the Power House Building (40 feet by 40 feet). The limits of the planned capping area would be 60 feet by 60 feet.
- Laundry Building – lead impacted soils in a 10 foot wide strip around the perimeter of the building (10 feet by 296 feet). The limits of the planned capping area would be 30 feet by 316 feet.
- Treatment Center Building – lead impacted soils in a 10 foot wide strip around the perimeter of the building (10 feet by 935 feet) and VOC impacted soils from the eastern side of the building (20 feet by 50 feet). The limits of the planned capping area would be 30 feet by 955 feet and 40 feet by 70 feet, respectively.
- Exterior Soils around the North Water Tower – lead impacted soils in a 10 foot wide strip around the base of the north water tower (10 feet by 135 feet). The limits of the planned capping area would be 30 feet by 155 feet.

Clean fill, meeting GDCS residential and leach-based standards, will be placed over the impacted soil prior to reseeded. The clean fill will also have low permeability to protect the underlying groundwater.

A Deed Use Restriction will be placed on the Property establishing a two (2) foot point of compliance (POC) for restricted residential land use.

An Operation and Maintenance Plan (O&M Plan) will be prepared to maintain and monitor the two (2)-foot modified residential point of compliance on the Property. The O&M Plan will be implemented to manage the two (2) foot POC as an engineering control across the affected portions of the Property. The purpose of the engineering control is to prevent a resident's exposure via direct contact with soil at depths greater than two (2) feet bgs and leaching to groundwater. The O&M Plan will include a Risk Mitigation Plan necessary to ensure the residential receptors at the Property are not exposed to impacted soils beneath

November 23, 2015

the point of compliance as a result of any construction activities such as landscaping or maintenance of infrastructure/utilities.

1. Effectiveness – This alternative would leave impacted soils in place under a soil cap at the Property. Does not reduce contaminants on Property, imposes O&M obligations and does not eliminate risk to groundwater.
2. Implementability – This alternative is implementable but would inhibit site redevelopment.
3. Resilience – This alternative would be resilient to reasonably foreseeable changing climate conditions (i.e., severe thunderstorms, excess summer rains, winter storms, and heavy precipitation events). The Property is not located within a floodplain or in close proximity to any large bodies of water (lakes or rivers) to be affected by changing water levels.
4. Cost – This alternative would cost approximately \$330,000.

#### Alternative #3 –Excavation with Ohio EPA VAP NFA Letter and CNS

With this alternate, the County will seek issuance of a No Further Action letter from an Ohio EPA VAP Certified Professional (CP) and may seek a Covenant Not to Sue (CNS) for the Property. A Remedial Investigation (RI) will be conducted to further delineate the areas to be excavated so the limits of the excavation can be predetermined. By predetermining the limits of each excavation area, the collection of confirmation soil samples is not necessary. In addition, waste characterization samples will be collected to determine if the lead impacted soils would be characterized as hazardous waste (United States Environmental Protection Agency [USEPA] Hazardous Waste Code D008). Alternative leach-based soil standards using the USEPA Seasonal Soil Compartment Model (SESOL) modeling program and following Ohio EPA VAP protocol will also be developed for this Project.

After the development of leach-based soil standards and completion of the RI defining each excavation area limits, soils at each area will be excavated, transported, and disposed at an off-site licensed facility as either lead impacted soil treated onsite and disposed as non-hazardous waste, VOC impacted soil characterized as hazardous waste (D code), or as non-hazardous solid waste.

The planned excavation areas and assumed excavation limits are the following based on the existing data and a reasonable expectation of limited distance of impacts:

- Power House Building – excavation of lead impacted soils in a 10 foot wide strip around the northern and eastern perimeter of the building (10 feet by 144 feet by 1 foot deep) and VOC impacted soils from the eastern side of the building (20 feet by 40 feet by 4 feet deep).  
Excavation of VOC impacted soils from an area by the northwest corner of the Power House Building (40 feet by 40 feet by 6 feet deep).
- Laundry Building – excavation of lead impacted soils in a 10 foot wide strip 296 feet in length around the perimeter of the building (10 feet by 296 feet by 1 foot deep).
- Treatment Center Building – excavation of lead impacted soils in a 10 foot wide strip 935 feet in length around the perimeter of the building (10 feet by 935 feet by 1 foot deep) and VOC impacted soils from the eastern side of the building (20 feet by 50 feet by 2 feet deep)
- Exterior Soils around North Water Tower – excavation of lead impacted soils in a 10 foot wide strip around the base of the north water tower (10 feet by 135 feet by 1 foot deep).

The excavated areas will be backfilled to original grade with clean fill meeting VAP Residential standards.

1. Effectiveness – This alternative would render the Property safe for any intended future use without operation and maintenance obligations or institutional controls and provide regulatory liability protection to the County and future owners.
2. Implementability – This alternative is implementable.

November 23, 2015

---

3. Resilience – This alternative would be resilient to reasonably foreseeable changing climate conditions (i.e., severe thunderstorms, excess summer rains, winter storms, and heavy precipitation events). The Property is not located within a floodplain or in close proximity to any large bodies of water (lakes or rivers) to be affected by changing water levels.
4. Cost – This alternative would cost approximately \$402,000.

### **Recommendation**

Based on project size, time, cost, intended future Property use and planned construction/end use requirements, Alternative #1 - No Action method was deemed inappropriate because it would thwart the intended re-use of the Property.

Alternative #2 – The capping alternative was deemed inappropriate because impacted soils would remain a potential risk for leaching to groundwater and construction worker exposures, and site redevelopment would be inhibited by O&M obligations

Based on the evaluation criteria, Alternative #3 –Excavation of impacted soils followed by the issuance of an NFA Letter and obtaining a CNS for the Property is a cost effective approach that would facilitate the planned use of the Property without continuing obligations and provide regulatory liability protection to the County and future owners.

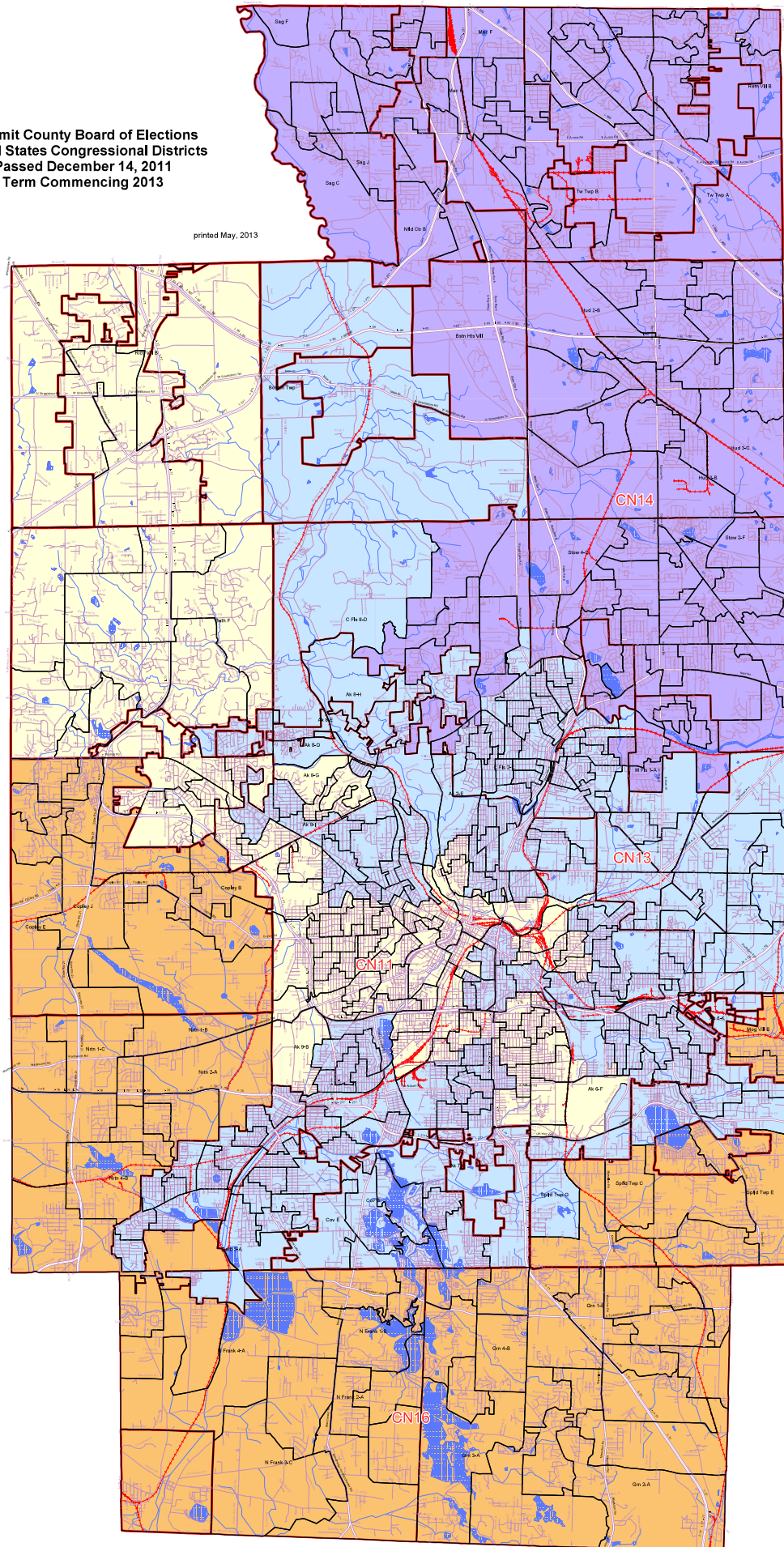
### **Applicable Regulations and Cleanup Standards**

All work will be conducted in accordance with the Ohio EPA Voluntary Action Program Rules set forth in Ohio Administrative Code (OAC) 3745-300 and under the oversight of the Ohio EPA Division of Environmental Response and Revitalization. The County will obtain concurrence from the Ohio EPA to implement the clean-up work. Remediation work will be directed by an environmental consulting firm, contracted by the County, which is fully qualified in all aspects of assessment and remediation. The environmental consulting firm will utilize a Certified Professional licensed by Ohio EPA to oversee remediation activities and submittal of a No Further Action Letter for the Property.



**Summit County Board of Elections  
United States Congressional Districts  
Passed December 14, 2011  
Term Commencing 2013**

printed May, 2013



## Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

12/17/2015

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:** The County of Summit, Ohio

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

34-6002767

**\* c. Organizational DUNS:**

0208320720000

**d. Address:**

**\* Street1:**

175 South Main Street

**Street2:**

**\* City:**

Akron

**County/Parish:**

**\* State:**

OH: Ohio

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

44308-1662

**e. Organizational Unit:**

**Department Name:**

**Division Name:**

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

Mr.

**\* First Name:**

Craig

**Middle Name:**

**\* Last Name:**

Stanley

**Suffix:**

**Title:** Director

**Organizational Affiliation:**

**\* Telephone Number:** 330-929-2440

**Fax Number:** 330-926-2471

**\* Email:** cstanley@summitoh.net

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Environmental Protection Agency

### 11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

### \* 12. Funding Opportunity Number:

EPA-OSWER-OBLR-15-06

\* Title:

FY16 Guidelines for Brownfields Cleanup Grants

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

FY2016 Brownfields Cleanup Grant for hazardous substances at the Former Edwin Shaw Hospital Property for The County of Summit, Ohio.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="200,000.00"/>
* b. Applicant	<input type="text" value="40,000.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="162,000.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="402,000.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: \* Signature of Authorized Representative:  \* Date Signed: